December 3, 2002

RE: Newco Metals 093-15313-05064
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

December 3, 2002

Mr. Paul Boening
Newco Metals Processing, Inc.
4635 Peerless Road
Bedford, IN 47421

Re: **093-15313**
First Significant Permit Modification to
Part 70 No.: T 093-7641-05064

Dear Mr. Boening:

Newco Metals Processing, Inc. was issued a Part 70 Operating Permit on September 1, 1999, for a stationary aluminum processing source. A letter requesting changes to this permit was received on December 19, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of:

(a) correcting the listed capacities of the one (1) natural gas-fired rotary furnace, identified as MF3, and the one (1) double drum magnetic separator, identified as SP, and correcting the 326 IAC 6-3-2, Process Operations, limits in the permit to reflect the correct capacities of those facilities;

(b) changing the identification of the existing facilities to better reflect their operations;

(c) removing facilities from the permit that have been removed or were never constructed;

(d) incorporating the requirements of 40 CFR 63, Subpart RRR, into the permit and allowing the removal of the requirement for a continuous surveillance system on the rotating drum dryer when compliance with 40 CFR 63, Subpart RRR, is achieved; and

(e) correcting the required pressure drop of the rotary furnace baghouse (RF-BH) based on the most recent stack test.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit. For your convenience, the entire Part 70 Operating Permit, with all revisions made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
CAP/MES
cc: File - Lawrence County
U.S. EPA, Region V
Lawrence County Health Department
Air Compliance Section Inspector - Richard Sekula, Vaughn Ison
Compliance Branch - Karen Nowak
Administrative and Development - Cynthia Bymaster
Technical Support and Modeling - Michelle Boner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Newco Metals Processing, Inc.
4635 Peerless Road
Bedford, Indiana 47421

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 093-7641-05064	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 1, 1999 Expiration Date: September 1, 2004

First Reopening No. 093-13383-05064, issued on January 8, 2002
First Administrative Amendment 093-15433-05064, issued on January 28, 2002

First Significant Permit Modification: 093-15313-05064	Sections Affected: A.2, A.3, D.1, D.2, D.3, D.4 and D.5
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 3, 2002

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Certification Form
Semi-Annual Compliance Monitoring Form
Emergency/Deviation Occurrence Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary aluminum processing source.

Responsible Official:	Plant Manager
Source Address:	4635 Peerless Road, Bedford, Indiana 47421
Mailing Address:	4635 Peerless Road, Bedford, Indiana 47421
SIC Code:	3341
County Location:	Lawrence
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) custom natural gas-fired rotating drum dryer (scrap dryer), identified as DR, with a maximum capacity of 20,000 pounds of aluminum per hour and a maximum heat input capacity of 4.24 million British thermal units per hour, using an 8.5 million British thermal unit per hour afterburner as control, and exhausting to stack DR-1.

(b) One (1) natural gas-fired rotary furnace, identified as RF, with a maximum heat input capacity of 9.0 million British thermal units per hour, and a maximum capacity of 7,000 pounds of aluminum per hour, using a capture hood and a baghouse (RF-BH) as control, and exhausting to stack RF-BH.

(c) One (1) conveyorized screen separator, identified as SS, with a maximum capacity of 8,000 pounds of scrap aluminum per hour, using a capture hood and a baghouse (SS-BH) as control, and exhausting to stack SS-BH.

(d) One (1) double drum magnetic separator, identified as MS, with a maximum capacity of 3,000 pounds of scrap aluminum per hour, using a capture hood and a baghouse (MS-BH) as control, and exhausting to stack MS-BH.

(e) One (1) hammermill, identified as HM.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ,, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for

changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall currently be controlled according to the plan submitted on December 12, 1996. If the plan is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable plan. The current plan consists of:

(a) furnaces being located indoors when possible.

(b) furnaces being inclosed on three sides and the hoods being enclosed on three sides when the furnaces must be located outside.

(c) fugitive emissions from the unpaved roads and parking areas being treated with water or a suitable and effective dust suppressant approved by the commissioner as needed.

(d) aggregate piles being relocated indoors where possible.

(e) areas around the aggregate piles being cleaned and swept as needed.

(f) vehicle transfer distance between furnaces and piles being minimized.

(g) the application of water or a suitable and effective chemical dust suppressants being used to minimize visible emissions from the aggregate piles where necessary.

(h) the frequency, if applicable, of water or chemical spray being as needed.

C.8 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Temperature Sensor Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device or temperature of any part of a unit or control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these

corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not

operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the

Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) custom natural gas-fired rotating drum dryer (scrap dryer), identified as DR, with a maximum capacity of 20,000 pounds of aluminum per hour and a maximum heat input capacity of 4.24 million British thermal units per hour, using an 8.5 million British thermal unit per hour afterburner as control, and exhausting to stack DR-1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to PC (47)-1789, issued January 12, 1990, the afterburner for VOC control is the best available control technology (BACT) for this facility and shall limit VOC emissions to no more than 9.93 pounds per hour, equivalent to 43.5 tons per year.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the dryer and afterburner shall not exceed 19.2 pounds per hour when operating at a process weight rate of 20,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the one (1) rotating drum dryer (scrap dryer), identified as DR, as of March 23, 2004, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.1.4 Emission Standards for Secondary Aluminum Production [40 CFR Part 63.1505, Subpart RRR]

(a) Pursuant to 40 CFR 63.1505(e), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee, shall operate the afterburner, having a design residence time of at least one (1) second, at all times when the dryer, which is considered a scrap dryer, is in operation and shall maintain an operating temperature at the afterburner of at least 750 °C (1400 ° F) at all times.

(b) Pursuant to 40 CFR 63.1505(e)(1), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall not discharge or cause to be discharged to the atmosphere emissions from the scrap dryer in excess of:

(1) 0.10 kg of THC, as propane, per Mg (0.20 lb of THC, as propane, per ton) of feed/charge;

(2) 0.15 kg of PM per Mg (0.30 lb per ton) of feed/charge;

(3) 5.0 μg of D/F TEQ per Mg (7.0×10^{-5} gr of D/F TEQ per ton) of feed/charge; and

(4) 0.75 kg of HCl per Mg (1.50 lb per ton) of feed/charge.

D.1.5 Operating Requirements for Secondary Aluminum Production [40 CFR Part 63.1506, Subpart RRR]

Pursuant to 40 CFR Part 63.1506, the following conditions shall apply to the scrap dryer, identified as DR, as of March 23, 2004:

(a) Pursuant to 40 CFR 63.1506(b), the Permittee shall provide and maintain easily visible labels that identifies the applicable emission limit and means of compliance. The labels shall include:

(1) The type of affected emission unit (i.e., scrap dryer/delaquering kiln/decorating kiln);

(2) The applicable operational standard and control method, including the type of charge to be used in the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan; and

(3) The afterburner operating temperature and design residence time.

(b) Pursuant to 40 CFR 63.1506(c), the Permittee shall:

(1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice";

(2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(3) Operate each capture/collection system according to the procedures and requirements in the Operation, Maintenance, and Monitoring Plan.

(c) Pursuant to 40 CFR 63.1506(d), the Permittee shall install and operate a device that measures and records the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system in accordance with the Operation, Maintenance, and Monitoring Plan.

(d) Pursuant to 40 CFR 63.1506(g), the Permittee shall operate the afterburner at all times the respective Scrap Dryer is in operation, in accordance with the OM&M plan. For the afterburner, the Permittee shall:

(1) Maintain the 3-hour block average operating temperature of each afterburner at or above the average temperature established during the performance test.

(2) Operate the afterburner in accordance with the OM&M plan.

(e) If an additional control device, such as a fabric filter, is necessary for the scrap dryer to comply with the emission limitations of Condition D.1.4, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the operating requirements for the control device.

(f) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include

follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR Part 63.1511, Subpart RRR]

(a) During the period between 30 and 36 months after issuance of this permit (T 093-7641-05064, issued on September 1, 1999), the Permittee shall perform VOC testing utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(b) During the period between 30 and 36 months after issuance of this permit (T 093-7641-05064, issued on September 1, 1999), the Permittee shall perform PM testing utilizing Method 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(c) In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(d) Within 180 days of March 23, 2004, which is the final compliance date for Subpart RRR, in order to demonstrate compliance with Condition D.1.4, the Permittee shall perform PM, HCl, D/F and THC testing on the outlet of the afterburner on the scrap dryer, identified as DR, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. This test for PM emissions shall also satisfy the requirements of Condition D.1.7(b).

(1) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(2) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.

(3) Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitation contained in Condition D.1.1 shall be demonstrated by

operating the afterburner for VOC control at all times when the dryer is in operation. Pursuant to PC (47)-1789, issued January 12, 1990, when the dryer is in operation when venting to the atmosphere, the chamber temperature of the afterburner shall be maintained at no less than 1400 degrees Fahrenheit or another temperature determined by a stack test that verifies compliance with Condition D.1.1. Continuous instrumentation shall monitor and record this temperature to verify compliance with Condition D.1.1.

The instrument used for determining the temperature shall comply with Section C -Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Visible Emissions Notations

(a) Visible emission notations of the dryer and afterburner stack (DR-1) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) Pursuant to CP 093-5345-05064, issued November 7, 1996, stack emissions from the dryer and afterburner shall be monitored via a closed circuit TV Continuous Surveillance system. The Surveillance system shall be made capable of visually recording stack exhaust at night. The Surveillance system shall be operated a minimum of ninety-five percent (95%) of the total possible hours of any thirty (30) day period, and each videotape shall be preserved for inspection for at least thirty (30) days from the date of taping. Emissions recorded on these tapes shall not be used by or against Newco Metals Processing, Inc. in any enforcement action pertaining to visible emissions (326 IAC 5-1-2, Opacity Limitations). The Permittee may discontinue use of the closed circuit TV Continuous Surveillance System upon achieving compliance with Subpart RRR and receiving approval of the OM&M from IDEM, OAQ. If the Permittee installs a baghouse to comply with Subpart RRR, the Permittee shall apply for prior IDEM, OAQ, approval, and the permit will be modified to include any required baghouse monitoring before use of the continuous surveillance system is discontinued.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.10 Monitoring Requirements for Secondary Aluminum Production [40 CFR Part 63.1510, Subpart RRR]

Pursuant to 40 CFR 63.1510(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall monitor the scrap dryer and the afterburner according to the following requirements:

(a) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial or amended plan, the Permittee shall

comply with the conditions of the submitted plan. The plan shall include the following information:

(1) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(2) A monitoring schedule for each affected unit.

(3) Procedures for the proper operation and maintenance of each affected unit and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer=s instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control parameters, including procedures for annual inspections of afterburners.

(6) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (1) above, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(7) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(b) Pursuant to 40 CFR 63.1510(c), the Permittee shall inspect the labels for the scrap dryer at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

(c) Pursuant to 40 CFR 63.1510(d), the Permittee shall:

(1) Install, operate, and maintain a capture/collection system for the scrap dryer; and

(2) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(d) Pursuant to 40 CFR 63.1510(e), the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to the dryer over the same operating cycle or time period used in the performance test. The accuracy of the weight

measurement device or procedure shall be within one (1) percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(e) Pursuant to 40 CFR 63.1510(g), the Permittee shall:

(1) Install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements of continuous monitoring systems in 40 CFR Part 63 Subpart A.

(2) The temperature monitoring device shall:

(A) Be installed at the exit of each afterburner's combustion zone.

(B) Record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period.

(C) Have a recorder response range including zero and 1.5 times the average temperature established according to the requirements in 40 CFR 63.1512 (m).

(D) The reference method shall be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the IDEM, OAQ.

(3) Conduct an inspection of each afterburner at least once a year and record the results. At a minimum, an inspection shall include:

(A) Inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor;

(B) Inspection for proper adjustment of combustion air;

(C) Inspection of internal structures (e.g., baffles) to ensure structural integrity;

(D) Inspection of dampers, fans, and blowers for proper operation;

(E) Inspection for proper sealing;

(F) Inspection of motors for proper operation;

(G) Inspection of combustion chamber refractory lining and clean and replace lining as necessary;

(H) Inspection of afterburner shell for corrosion and/or hot spots;

(I) Documentation verifying that, for the burn cycle following the inspection, the afterburner is operating properly and all necessary adjustments have been made;

(J) Verification that the equipment is maintained in good operating condition.

(K) Following an equipment inspection, all necessary repairs shall be completed in accordance with the requirements of the OM&M plan.

(f) If an additional control device, such as a fabric filter, is necessary for the scrap dryer to comply with the emission limitations of Condition D.1.4, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the monitoring requirements for the control device.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the dryer and afterburner stack (DR-1) exhaust once per shift.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain the following:

(1) Continuous records of the temperature inside the afterburner chamber during normal operation when venting to the atmosphere.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(d) As of March 23, 2004, as required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Subpart RRR.

(1) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the facility. The remaining three (3) years of records may be retained off site.

(2) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

(3) The Permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(e) As of March 23, 2004, in addition to the general records required by 40 CFR 63.10(b), the Permittee shall maintain records of:

(1) Records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any three (3)- hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken.

(2) Records of annual afterburner inspections.

(3) Records of the feed/charge weight rates for each operating cycle or time period used in the performance test.

(4) Records of monthly inspections for proper unit labeling for the scrap dryer.

(5) Records of annual inspections of capture/collection and closed vent systems.

(6) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan; and

(B) Operation, Maintenance, and Monitoring Plan.

(f) If an additional control device, such as a fabric filter, is necessary for the scrap dryer to comply with the emission limitations of Condition D.1.4, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the record keeping requirements for the control device.

D.1.12 Notifications and Reports for Secondary Aluminum Production [40 CFR Part 63.1515 and 63.1516, Subpart RRR]

(a) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(b) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the dryer. The notification shall be signed by the responsible official who must certify its accuracy. The report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) Unit labeling as described in 40 CFR 63.1506(b), including process type or each affected unit classification and operating requirements.

(4) The compliant operating parameter value or range established for the dryer with supporting documentation and a description of the procedure used to establish the value (e.g., afterburner operating temperature), including the operating cycle or time period used in the performance test.

(5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for the capture/collection system required in 40 CFR 63.1506(c).

(6) Approved Operation, Maintenance, and Monitoring Plan.

(7) Startup, shutdown, and malfunction plan.

(c) Pursuant to 40 CFR 63.1516(a), prior to March 23, 2004, the Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(d) Pursuant to 40 CFR 63.1516(b), beginning in 2004, the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(2) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(3) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Part 63, Subpart RRR.

(e) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) As of March 23, 2004, for the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the owner or operator shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by Subpart RRR; and

(2) All monitoring, record keeping, and reporting requirements were met during the year.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(b) One (1) natural gas-fired rotary furnace, identified as RF, with a maximum heat input capacity of 9.0 million British thermal units per hour, and a maximum capacity of 7,000 pounds of aluminum per hour, using a capture hood and a baghouse (RF-BH) as control, and exhausting to stack RF-BH.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM_{10}) [326 IAC 2-2] [40 CFR 52.21, PSD]

The potential to emit PM_{10} from the rotary furnace shall be limited to less than 3.42 pounds per hour. This will limit the potential to emit PM_{10} from the rotary furnace to less than 15 tons per year. Thus, the requirements of 326 IAC 2-2 and 40 CFR 52.21, PSD, are not applicable.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(e)] [326 IAC 2-2] [40 CFR 52.21, PSD]

(a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the rotary furnace shall not exceed 9.49 pounds per hour, when operating at a process weight rate of 7,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) The potential to emit PM from the rotary furnace shall be limited to less than 5.71 pounds per hour. This will limit the potential to emit PM from the rotary furnace to less than 25 tons per year. Thus, the requirements of 326 IAC 2-2 and 40 CFR 52.21, PSD, are not applicable.

D.2.3 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the one (1) rotary furnace, identified as RF, as of March 23, 2004, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.2.4 Emission Standards for Secondary Aluminum Production [40 CFR Part 63.1505, Subpart RRR]

Pursuant to 40 CFR 63.1505(i) and (k), on and after the date of approval of the Operation, Maintenance and Monitoring Plan by IDEM, OAQ, the rotary furnace, which is considered a Group I furnace that does not only process clean charge, but does not have a sidewell or inline fluxer, shall comply with the following limits, based on a 3-day, 24-hour rolling average emission rate:

(a) 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed/charge;

(b) 15 Fg of D/F TEQ per Mg (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge; and

(c) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge.

D.2.5 Operating Requirements for Secondary Aluminum Production [40 CFR Part 63.1506, Subpart RRR]

Pursuant to 40 CFR Part 63.1506, the following conditions shall apply to the one (1) rotary furnace, identified as RF, as of March 23, 2004:

(a) Pursuant to 40 CFR 63.1506(b), the Permittee shall provide and maintain easily visible labels at the rotary furnace that identifies the applicable emission limit and means of compliance. The labels shall include:

(1) The type of affected emission unit (i.e., Group 1 Furnace); and

(2) The applicable operational standard and control method, including the type of charge to be used in the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan.

(b) Pursuant to 40 CFR 63.1506(c), the Permittee shall:

(1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice";

(2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(3) Operate each capture/collection system according to the procedures and requirements in the Operation, Maintenance, and Monitoring Plan.

(c) Pursuant to 40 CFR 63.1506(d), the Permittee shall install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system or other weight determination procedure in accordance with the Operation, Maintenance, and Monitoring Plan.

(d) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.2.7 Opacity [326 IAC 2-1-3(i)(B)]

Pursuant to CP 093-5345-05064, issued November 7, 1996, visible emissions escaping the capture hood shall not exceed twenty percent (20%) opacity, taken as an average of three (3) readings taken five (5) seconds apart.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR Part 63.1511, Subpart RRR]

(a) During the period between 30 and 36 months after issuance of this permit (T 093-7641-05064, issued on September 1, 1999), the Permittee shall perform PM testing utilizing

Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) Within 180 days after March 23, 2004, which is the final compliance date for Subpart RRR, in order to demonstrate compliance with Condition D.2.4, the Permittee shall perform PM, HCl and D/F testing on the baghouse, identified as RF-BH, using methods as approved by the Commissioner. When testing baghouse, the rotary furnace shall be operated at ninety-five percent (95%) or more of its maximum design capacities. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. This test for PM emissions shall also satisfy the requirements of Condition D.2.8(a).

(1) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(2) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.

(3) Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

(c) During the period between 30 and 36 months after issuance of SPM 093-15313-05064, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM_{10} testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.9 Particulate Matter (PM)

(a) Pursuant to CP 093-5345-05064, issued November 7, 1996, the capture hood and baghouses for PM control shall be in operation at all times when the corresponding rotary furnaces are in operation.

(b) Pursuant to CP 093-5345-05064, issued November 7, 1996, the capture hoods shall either be enclosed on three sides (if the furnace is located outdoors), or be located with the furnace inside a building to minimize drafts.

(c) Pursuant to CP 093-5345-05064, issued November 7, 1996, the waste dross cooling area shall either be covered and piped to a baghouse, or be located inside a building to minimize emissions.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.10 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack (RF-BH) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) Pursuant to CP 093-5345-05064, issued November 7, 1996, and Condition D.2.7, notations of visible emissions escaping the capture hood shall be performed.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the rotary furnace, at least once per working shift when the rotary furnace is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse RF-BH shall be maintained within the range of 5.0 and 12.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instruments used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.12 Broken Bag or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.13 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the rotary furnace when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.14 Monitoring Requirements for Secondary Aluminum Production [40 CFR Part 63.1510, Subpart RRR]

Pursuant to 40 CFR 63.1510(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall monitor the rotary furnace and the baghouse according to the following requirements:

(a) Pursuant to 40 CFR 63.1510(t), the Permittee shall calculate and record the 3-day, 24- hour rolling average emissions of PM, HCl, and D/F for the rotary furnace, on a daily basis. To calculate the 3-day, 24-hour rolling average, the Permittee shall:

(1) Calculate and record the total weight of material charged to the furnace for each 24-hour day of operation using the feed/charge weight data collected as required under Subpart RRR.

(2) Multiply the total feed/charge weight to the furnace for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the emission test) to provide emissions for each emission unit for the 24-hour period, in pounds.

(3) Divide the total emissions for the furnace for the 24-hour period by the total material charged to the furnace.

(4) Compute the 24-hour daily emission rate using the equation:

$$E_{day} = \frac{\sum_{i=1}^{n} \left(T_{ix} ER_i \right)}{\sum_{i=1}^{n} T_i}$$

Where,

E_{day} = The daily respective PM, HCl, or D/F emission rate for the secondary aluminum processing unit for the 24-hour period;

T_i = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period in tons;

ER_i = The measured emission rate for emission unit i as determined in the performance test (lb/ton or Fg/Mg or feed/charge); and

n = The number of emission units in the secondary aluminum processing unit.

(5) Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

(b) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial or amended plan, the Permittee shall comply with the conditions of the submitted plan. The plan shall include the following information:

(1) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(2) A monitoring schedule for each affected unit.

(3) Procedures for the proper operation and maintenance of each affected unit and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control parameters.

(6) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (1) above, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(7) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(c) Pursuant to 40 CFR 63.1510(c), the Permittee shall inspect the labels for the rotary furnace at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

(d) Pursuant to 40 CFR 63.1510(d), the Permittee shall:

(1) Install, operate, and maintain a capture/collection system for the furnace; and

(2) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(e) Pursuant to 40 CFR 63.1510(e), the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to the furnace over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement device or procedure shall be within one (1) percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(f) Pursuant to 40 CFR 63.1510(f)(1), the Permittee shall install, calibrate, maintain, and continuously operate a bag leak detection system for the baghouse controlling emissions from the rotary furnace. The following requirements shall apply:

(1) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(2) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997). Other bag leak detection systems shall be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations.

(3) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(4) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

(5) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.

(6) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

(7) For positive pressure fabric filter systems, a bag leak detection system shall be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.

(8) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(9) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(10) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

(g) Pursuant to 63.1510(j), the Permittee shall:

(1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of flux injected into each affected unit. The monitoring system shall record the weight for each fifteen (15) minute period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement shall be within one (1) percent of the weight of the reactive component of the flux being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(2) Calculate and record the flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test.

(3) Record, for each fifteen (15) minute time period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of reactive flux.

(4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.15 Record Keeping Requirements

(a) To document compliance with Condition D.2.10, the Permittee shall maintain records of visible emission notations of the baghouse stack (RF-BH) exhaust once per shift.

(b) To document compliance with Condition D.2.11, the Permittee shall maintain the following:

(1) Records of the following operational parameters once per shift during normal operation when venting to the atmosphere:

Total static pressure drop

(2) Records of inlet temperature sensor alarms.

(3) Documentation of all response steps implemented, per event.

(4) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(5) Quality Assurance/Quality Control (QA/QC) procedures.

(6) Operator standard operating procedures (SOP).

(7) Manufacturer's specifications or its equivalent.

(8) Equipment "troubleshooting" contingency plan.

(9) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.13, the Permittee shall maintain records of the results of the inspections required under Condition D.2.13 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(e) As of March 23, 2004, as required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Part 63, Subpart RRR.

(1) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the facility. The remaining three (3) years of records may be retained off site.

(2) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

(3) The Permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(f) As of March 23, 2004, in addition to the general records required by 40 CFR 63.10(b), the Permittee shall maintain records of:

(1) The number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

(2) Records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

(3) Records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

(4) Records of monthly inspections for proper unit labeling.

(5) Records of annual inspections of emission capture/collection and closed vent systems.

(6) Records for any approved alternative monitoring or test procedure.

(7) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan; and

(B) OM&M plan.

(8) Records of total charge weight for each twenty-four- (24-) hour period and calculations of three- (3-) day, twenty-four- (24-) hour rolling average emissions.

D.2.16 Notifications and Reports for Secondary Aluminum Production [40 CFR Part 63.1515 and 63.1516, Subpart RRR]

(a) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(b) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the rotary furnace. The notification shall be signed by the responsible official who must certify its accuracy. The report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) Unit labeling as described in 40 CFR 63.1506(b), including process type or each affected unit classification and operating requirements.

(4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., alkaline agent injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

(5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for the capture/collection system required in 40 CFR 63.1506(c).

(6) Analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems required in 40 CFR 63.1510(f).

(7) Approved Operation, Maintenance, and Monitoring Plan.

(8) Startup, shutdown, and malfunction plan.

(c) Pursuant to 40 CFR 63.1516(a), prior to March 23, 2004, the Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(d) Pursuant to 40 CFR 63.1516(b), beginning in 2004, the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within one (1) hour.

(2) An excursion of a compliant process or operating parameter value or range (e.g., total reactive chlorine flux injection rate, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(3) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(4) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Subpart RRR.

(5) A deviation from the three- (3-) day, twenty-four (24-) hour rolling average emission limit for the furnace.

(e) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) As of March 23, 2004, for the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the owner or operator shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by Part 63, Subpart RRR; and

(2) All monitoring, record keeping, and reporting requirements were met during the year.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(c) One (1) conveyorized screen separator, identified as SS, with a maximum capacity of 8,000 pounds of scrap aluminum per hour, using a capture hood and a baghouse (SS-BH) as control, and exhausting to stack SS-BH.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the conveyorized screen separator shall not exceed 10.4 pounds per hour when operating at a process weight rate of 8,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit (T 093-7641-05064, issued on September 1, 1999), the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.3.4 Particulate Matter (PM)

The capture hood and baghouse (SS-BH) for PM control shall be in operation at all times when the conveyorized screen separator is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack (SS-BH) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the conveyorized screen separator, at least once per working shift when the conveyorized screen separator is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse SS-BH shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.3.7 Broken Bag or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the one (1) conveyorized screen separator when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack (SS-BH) exhaust.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:

(1) Records of the following operational parameters once per shift during normal operation when venting to the atmosphere:

Total static pressure drop

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) One (1) double drum magnetic separator, identified as MS, with a maximum capacity of 3,000 pounds of scrap aluminum per hour, using a capture hood and a baghouse (MS-BH) as control, and exhausting to stack MS-BH.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the double drum magnetic separator shall not exceed 5.38 pounds per hour when operating at a process weight rate of 3,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit (T 093-7641-05064, issued on September 1, 1999), the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.4.4 Particulate Matter (PM)

The capture hood and baghouse (MS-BH) for PM control shall be in operation at all times when the double drum magnetic separator is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack (MS-BH) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the double drum magnetic separator, at least once per working shift when the double drum magnetic separator is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse MS-BH shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.7 Broken Bag or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the one (1) double drum magnetic separator when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

(a) To document compliance with Condition D.4.5 the Permittee shall maintain records of daily visible emission notations of the baghouse stack (MS-BH) exhaust.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:

(1) Records of the following operational parameters once per shift during normal operation when venting to the atmosphere:

Total static pressure drop

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - **Hammermill**

(e) One (1) hammermill, identified as HM.

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the hammermill shall each not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the hammermill, as of March 23, 2004, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.5.3 Emission Standards for Secondary Aluminum Production [40 CFR Part 63.1505, Subpart RRR]

Pursuant to 40 CFR 63.1505(b)(1), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall not discharge or cause to be discharged to the atmosphere emissions from the hammermill, which is an aluminum scrap shredder, in excess of 0.023 grams (g) of PM per dry standard cubic meter (dscm) (0.010 grain (gr) of PM per dry standard cubic foot (dscf)).

D.5.4 Operating Requirements for Secondary Aluminum Production [40 CFR Part 63.1506, Subpart RRR]

Pursuant to 40 CFR Part 63.1506, the following conditions shall apply to the one (1) hammermill, as of March 23, 2004:

(a) If a control device, such as a fabric filter, is necessary for the hammermill to comply with the emission limitation of Condition D.5.3, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the operating requirements for the control device.

(b) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR Part 63, Subpart RRR]

Within 180 days of March 23, 2004, in order to demonstrate compliance with Condition D.5.2, the Permittee shall perform PM testing on the hammermill, using methods as approved by the Commis-

sioner. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(a) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(b) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.6 Monitoring Requirements for Secondary Aluminum Production [40 CFR Part 63.1510, Subpart RRR]
Pursuant to 40 CFR 63.1510(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall monitor the hammermill according to the following requirements:

(a) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial or amended plan, the Permittee shall comply with the conditions of the submitted plan. The plan shall include the following information:

(1) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(2) A monitoring schedule for each affected unit.

(3) Procedures for the proper operation and maintenance of each affected unit and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control parameters, including procedures for annual inspections of afterburners, and if applicable, the procedures to be used for determining feed (or throughput) weight if a measurement device is not used.

(6) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (a)(1) above, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(7) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(b) If a control device, such as a fabric filter, is necessary for the hammermill to comply with the emission limitation of Condition D.5.3, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the monitoring requirements for the control device.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements [40 CFR 63.1517]

(a) The Permittee shall maintain files of all information, including reports and notifications, required by 40 CFR 63.10 and 40 CFR 63.1517. The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off-site. The Permittee may retain records on microfilm, computer disks, magnetic tape or microfiche.

(b) In addition to the general records required by 40 CFR 60.10(b), the Permittee shall maintain a current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(1) Startup, shutdown, and malfunction plan; and

(2) Operation, Maintenance, and Monitoring Plan.

(c) If a control device, such as a fabric filter, is necessary for the hammermill to comply with the emission limitation of Condition D.5.3, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the record keeping requirements for the control device.

D.5.8 Notifications and Reports for Secondary Aluminum Production [40 CFR Part 63.1515 and 63.1516, Subpart RRR]

(a) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(b) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the hammermill. The notification shall be signed by the responsible official who must certify its accuracy. The report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., alkaline agent injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

(4) Approved Operation, Maintenance, and Monitoring Plan.

(5) Startup, shutdown, and malfunction plan.

(c) Pursuant to 40 CFR 63.1516(a), the Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(d) Pursuant to 40 CFR 63.1516(b), beginning in 2004, the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(2) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(3) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Subpart RRR.

(e) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) As of March 23, 2004, for the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the owner or operator shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by Part 63, Subpart RRR; and

(2) All monitoring, record keeping, and reporting requirements were met during the year.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Newco Metals Processing, Inc.
Source Address: 4635 Peerless Road, Bedford, Indiana 47421
Mailing Address: 4635 Peerless Road, Bedford, Indiana 47421
Part 70 Permit No.: T 093-7641-05064

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Newco Metals Processing, Inc.
Source Address: 4635 Peerless Road, Bedford, Indiana 47421
Mailing Address: 4635 Peerless Road, Bedford, Indiana 47421
Part 70 Permit No.: T 093-7641-05064

Months:_____ to_____Year:_____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of Each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Newco Metals Processing, Inc.
Source Address: 4635 Peerless Road, Bedford, Indiana 47421
Mailing Address: 4635 Peerless Road, Bedford, Indiana 47421
Part 70 Permit No.: T 093-7641-05064

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	**Newco Metals Processing, Inc.**
Source Location:	**4635 Peerless Road, Bedford, Indiana 47421**
County:	**Lawrence**
Operation Permit No.:	**T 093-7641-05064**
Significant Permit Modification No.:	**093-15313-05064**
SIC Code:	**3341**
Permit Reviewer:	**CarrieAnn Paukowits**

On May 2, 2002, the Office of Air Quality (OAQ) had a notice published in the Times-Mail, Bedford, Indiana, stating that Newco Metals Processing, Inc. had applied for a Significant Permit Modification to a Part 70 Operating Permit for the stationary aluminum processing source. The modification consists of correcting the listed capacities of the one (1) natural gas-fired rotary furnace (MF3) and the one (1) double drum magnetic separator (SP), and correcting the 326 IAC 6-3-2, Process Operations, limits in the permit to reflect the correct capacities of those facilities. The modification also changes the identification of the existing facilities to better reflect their operations, removes facilities from the permit that have been removed or were never constructed, incorporates the requirements of 40 CFR 63, Subpart RRR, into the permit and allows the removal of the requirement for a continuous surveillance system on the rotating drum dryer when compliance with 40 CFR 63, Subpart RRR, is achieved, and corrects the required pressure drop of the rotary furnace baghouse (RF-BH) based on the most recent stack test. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

On May 6, 2002, Timothy Terry, Robert Adamson, and Janie Craig Chenault, on behalf of the Board of Commissioners, County of Lawrence, submitted a comment on the proposed Significant Permit Modification to a Part 70 Operating Permit. The comment is as follows:

Comment 1:

The Board of Commissioners of Lawrence County hereby request that a public hearing for the subject permit modification be held in response to the enclosed correspondence from IDEM. The Commissioners are concerned about the current operation of the subject facility due to the nature of the complaints they have received from the adjoining neighbors. The Commissioners, therefore, would like an opportunity to address the current operation as well as the proposed modifications in a public forum. We look forward to a favorable response to our request.

Response 1:

A public hearing was held on July 22, 2002, at 7 PM, at the Council Meeting Chambers, 1102 16th Street, Bedford, Indiana 47421. Janie Craig Chenault represented the Board of Commissioners of Lawrence County. There were no additional comments.

Comment 2, Summarized:

On May 20, 2002, Bob Fortner, resident, submitted a comment on the proposed Significant Permit Modification to a Part 70 Operating Permit.

Mr. Fortner pointed out that no one had commented during the public notice period in January 2002, when this permit was reopened. He feels that he, and other citizens such as himself, can have little effect on the permit decision by making comments or attending public hearings. He further expresses concern that Newco Metals was not operating in compliance with the terms and conditions of their permit, and that this has been a long-term problem. He also expressed concern that the proposed permit change would adversely affect air quality, and would increase the amount of smoke, dust, fumes, and noise. Finally, Mr. Fortner expressed general dissatisfaction that IDEM is not adequately addressing polllution.

Response 2:

IDEM, OAQ, thanks you for your comment. IDEM values public participation in the permitting process. The purpose of the public comment period is to inform the public of proposed changes and to solicit comments. All comments are considered by IDEM when making a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues.

IDEM is aware that the facility has had compliance problems in the past. In January 2001, IDEM began enforcement action against Newco for operating equipment without the proper air pollution control device from February 2000 to June 2001. This enforcement action is ongoing.

The purpose of enforcement action is to bring the source into compliance with their permit and to discourage future violations. Fines are calculated based on IDEM's civil penalty policy. Similar types of violations result in similar penalties. A history of past violations is considered when assessing fines.

The amount of the fine depends on the magnitude of the violation, the potential harm to human health and the environment, the economic benefit gained by the violator by not complying, and the violator's efforts to achieve compliance. A history of past violations is also considered when assessing fines. Fines are calculated using IDEM's Civil Penalty Policy, available by calling the Office of Enforcement at 1-800-451-6027 ext 3-5523 and on the IDEM website at: www.in.gov/idem/oe/nrp/civil.html

Since the January 2001 violation, compliance staff have conducted two inspections of the plant and one field surveillance of the plants' emissions. No additional violations have been discovered.

The purpose of this permit modification is to clarify some conditions and descriptions in the permit. It is important to note that the permit does not allow Newco to add new equipment or to increase its emissions. In addition, Newco Metals Processing, Inc., will still be required to comply with all applicable rules. The following list describes all proposed changes to the permit:

(a) The listed capacities of the one (1) natural gas-fired rotary furnace (MF3) and the one (1) double drum magnetic separator (SP) are corrected, as well as the 326 IAC 6-3-2, Process Operations, limits in the permit, which are dependent upon the capacity of each process. The correct capacity of the rotary furnace is 9.0 million British thermal units per hour of natural gas, rather than the 6.0 million British thermal units per hour listed in the Part 70 Operating Permit, and 7,000 pounds of aluminum per hour, rather than 3,000 listed in the permit. The capacity of the double drum magnetic separator is 3,000 pounds of scrap aluminum per hour, rather than the 8,000 pounds listed in the Part 70 Operating Permit. Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the rotary furnace is 9.49 pounds per hour, rather than the 5.38 pounds per hour listed in the Part 70 Operating Permit, and the allowable PM emission rate from the double drum mag-

netic separator is 5.38 pounds per hour, rather than the 10.4 pounds per hour listed in the Part 70 Operating Permit. The overall effect is a decrease in the allowable PM emissions from the two (2) processes from 15.8 pounds per hour to 14.9 pounds per hour. There was no physical change and the source, and this is only a correction in the stated capacities. However, since this is considered a change in the method of operation which results in an increase in the potential to emit at the rotary furnace, the limitations discussed in Change 2 of the OAQ changes have been added for the rotary furnace. Please see Change 2 toward the end of this document.

(b) The identification of the existing facilities have been changed to better reflect their operations. This is an administrative change. There are no new facilities.

(c) Two (2) natural gas-fired rotary furnaces and one (1) centrifuge listing in the Part 70 Operating Permit were never constructed and have been removed from the permit.

(d) This source will be subject to the National Emission Standards for Hazardous Air Pollutants, for Secondary Aluminum Production, 40 CFR 63.1500 (Subpart RRR). This existing affected source must comply with the requirements of Subpart RRR by March 23, 2004. The requirements of this rule will be incorporated into the Part 70 Operating Permit by the proposed Significant Permit Modification.

(e) This Significant Permit Modification removes the requirement for a continuous surveillance system on the rotating drum dryer when compliance with 40 CFR 63, Subpart RRR, is achieved. This rule (Subpart RRR) gives the source an option of using a continuous opacity monitor on the dryer or installing a bag leak detection system for scrap dryers controlled by a baghouse. Currently, the dryer is not equipped with a baghouse. The Permittee may only discontinue use of the closed circuit TV Continuous Surveillance System upon achieving compliance with Subpart RRR and receiving approval of the written Operation, Maintenance, and Monitoring from IDEM, OAQ. If the source must install a baghouse to comply with Subpart RRR, the Permittee must apply for prior IDEM, OAQ, approval, and the permit will be modified to include any required baghouse monitoring before use of the continuous surveillance system is discontinued.

(f) The required pressure drop of the rotary furnace baghouse (RF-BH) is revised based on the most recent stack test. This is an administrative change.

IDEM has many programs in place to control air pollution statewide, and Indiana's air has become significantly cleaner in the last 10 years. The U.S. Environmental Protection Agency (U.S. EPA) has set National Ambient Air Quality Standards (NAAQS) for six common air pollutants, also called "criteria" pollutants. The criteria pollutants are carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter and sulfur dioxide. Lawrence County's air currently meets these standards for all pollutants.

IDEM recognizes that concerns related to "quality of life" issues such as odor and noise are very important to those who express them; however, these types of concerns do not have a direct impact on how the OAQ reviews and makes decisions on air permit applications. OAQ's permit review by law cannot address issues for which it does not have direct regulatory authority.

On May 31, 2002, Mark A. Derf and Charles J. Staehler of August Mack Environmental, Inc., on behalf of Newco Metals Processing, Inc., submitted comments on the proposed Significant Permit Modification to a Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

Comment 3:

Section D.1.7(a) and (b) - PM and VOC Testing Requirements for Rotating Drum Dryer

Newco maintains Conditions D.1.7(a) and D.1.7(b) are satisfied by Condition D.1.7(d). Subpart RRR requires PM and VOC testing of the rotating drum dryer within 180 days of the final compliance date of March 23, 2004. Therefore, Newco requests Conditions D.1.7(a) and D.1.7(b) be deleted from the permit and will be satisfied by Condition D.1.7(d).

Response 3:

As indicated in Condition D.1.7(d), the PM tests required by that condition will also satisfy the requirements of Condition D.1.7(b). According to the existing permit, issued on September 1, 1999, Condition D.1.7(b) requires a stack test by September 1, 2002. Condition D.1.7(d) requires testing within 180 days of March 23, 2004, which is the final compliance date for Subpart RRR. Therefore, Condition D.1.7(b) requires a performance test for PM well before a test is required by Condition D.1.7(d). Thus, Condition D.1.7(b) cannot be removed from the permit until the next stack test for PM is completed at the rotating drum dryer. In addition, Condition D.1.7(a) cannot be removed from the permit because Condition D.1.7(d) does not require testing for all VOC emissions. In order to clarify when the tests are required, Condition D.1.7 is revised as follows:

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR Part 63.1511, Subpart RRR]

(a) During the period between 30 and 36 months after issuance of this permit **(T 093-7641-05064, issued on September 1, 1999)**, the Permittee shall perform VOC testing utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(b) During the period between 30 and 36 months after issuance of this permit **(T 093-7641-05064, issued on September 1, 1999)**, the Permittee shall perform PM testing utilizing Method 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(c) In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(d) Within 180 days of March 23, 2004, which is the final compliance date for Subpart RRR, in order to demonstrate compliance with Condition D.1.4, the Permittee shall perform PM, HCl, D/F and THC testing on the outlet of the afterburner on the scrap dryer, identified as DR, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. This test for PM emissions shall also satisfy the requirements of Condition D.1.7(b).

(1) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(2) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.

(3) Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

Comment 4:

Section D.1.7(d) - Testing Requirements for Rotating Drum Dryer

The testing requirement for the rotating drum dryer should be repeated once every five (5) years, pursuant to 40 CFR 63.1511(e) which states "The owner or operator of new or existing affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every five years following the initial performance test." Stack test results from the dryer will be indicative of the day-to-day operations of the dryer and emissions are not expected to vary. The 2.5-year testing requirement is twice the frequency of the required repeat testing for affected sources as listed in the NESHAP. The cost of stack testing for particulate matter (PM), hydrochloric acid (HC1), dioxin/furans (D/F) and total hydrocarbons (THC) is expensive and a frequency of 2.5 years between tests will provide an unreasonable financial burden for Newco. Therefore, Newco requests to comply with 40 CFR 63.1511(e) and test the rotating drum dryer every five (5) years.

Response 4:

Although 40 CFR 63.1511(e) only requires performance tests once every five (5) years, IDEM, OAQ, requires such stack tests once every 2.5 years for all dryers and rotary furnaces at secondary aluminum processing plants. Thus, there are no changes to the permit as a result of this comment.

Comment 5:

Section D.2.12(a) - PM Testing Requirement for Rotary Furnace

Newco maintains that Condition D.2.12(a) be satisfied by Condition D.1.12(b) Subpart RRR requires PM testing of the rotary furnace within 180 days of the final compliance date of March 23, 2004. Therefore Newco requests Condition D.2.12(a) be deleted from the permit and will be satisfied by Condition D.2.12(b).

Response 5:

As indicated in Condition D.2.8(b) (formerly D.2.12(b)), the PM tests required by that condition will also satisfy the requirements of Condition D.2.8(a) (formerly D.2.12(a)). According to the existing permit, issued on September 1, 1999, Condition D.2.8(a) requires a test by September 1, 2002. Condition D.2.8(b) requires testing within 180 days of March 23, 2004, which is the final compliance

date for Subpart RRR. Therefore, Condition D.2.8(a) requires a performance test for PM well before a test is required by Condition D.2.8(b). Thus, Condition D.2.8(a) cannot be removed from the permit until the next stack test for PM is completed at the rotary furnace. In order to clarify when the tests are required, Condition D.2.8, as well as Conditions D.3.3 and D.4.3 are revised as follows:

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR Part 63.1511, Subpart RRR]

(a) During the period between 30 and 36 months after issuance of this permit **(T 093-7641-05064, issued on September 1, 1999)**, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) Within 180 days after March 23, 2004, which is the final compliance date for Subpart RRR, in order to demonstrate compliance with Condition D.2.4, the Permittee shall perform PM, HCl and D/F testing on the baghouse, identified as RF-BH, using methods as approved by the Commissioner. When testing baghouse, the rotary furnace shall be operated at ninety-five percent (95%) or more of its maximum design capacities. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. This test for PM emissions shall also satisfy the requirements of Condition D.2.8(a).

(1) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(2) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.

(3) Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

(c) During the period between 30 and 36 months after issuance of SPM 093-15313-05064, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM_{10} testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit **(T 093-7641-05064, issued on September 1, 1999)**, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be

repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit **(T 093-7641-05064, issued on September 1, 1999)**, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Comment 6:

Section D.2.12(b) - Testing Requirements for Rotary Furnace

The testing requirement for the rotary furnace should be repeated once every five (5) years, pursuant to 40 CFR 63.1511(e) which states "The owner or operator of new or existing affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every five years following the initial performance test." Stack test results from the furnace will be indicative of the day-to-day operations of the furnace and emissions are not expected to vary. The 2.5-year testing requirement is twice the frequency of the required repeat testing for affected sources as listed in the NESHAP. The cost for stack testing for PM, HC1 and D/F is expensive and a frequency of 2.5 years between tests will provide an unreasonable financial burden for Newco. Therefore, Newco requests to comply with 40 CFR 63.1511(e) and test the rotary furnace every five (5) years.

Response 6:

See response 4.

Comment 7:

Section D.2.19(a)(1)(B), Section D.3.9(a)(1)(B), Section D.4.9(a)(1)(B) - Cleaning Cycle Frequency

Newco requests the requirement of daily records of cleaning cycle frequency for each baghouse be removed from the permit. There are no effective methods to record the cleaning cycle frequency for each baghouse. Therefore, this requirement should be removed from the permit for each emission unit, as listed in Condition D.2.19(b)(1)(B), D.3.9(b)(1)(B) and D.4.9(b)(1)(B).

Response 7:

Records of cleaning cycle frequency are no longer required and have been removed from the permit. In addition, parametric monitoring of the pressure drop is required once per shift. Thus, records of the total static pressure drop should be maintained once per shift. Changes are as follows:

D.2.~~19~~**15** Record Keeping Requirements

(b) To document compliance with Condition ~~D.2.15~~ **D.2.11**, the Permittee shall maintain the following:

(1) ~~Daily~~ Records of the following operational parameters **once per shift** during normal operation when venting to the atmosphere:

~~(A) Inlet and outlet differential~~ **Total** static pressure **drop**~~; and~~

~~(B) Cleaning cycle: frequency and differential pressure.~~

D.3.9 Record Keeping Requirements

(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:

(1) ~~Daily~~ Records of the following operational parameters **once per shift** during normal operation when venting to the atmosphere:
~~(A) Inlet and outlet differential~~ **Total** static pressure **drop**~~; and~~

~~(B) Cleaning cycle: frequency and differential pressure.~~

D.4.9 Record Keeping Requirements

(b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:

(1) ~~Daily~~ Records of the following operational parameters **once per shift** during normal operation when venting to the atmosphere:

~~(A) Inlet and outlet differential~~ **Total** static pressure **drop**~~; and~~

~~(B) Cleaning cycle: frequency and differential pressure.~~

Comment 8:

Newco maintains that based on the stack test conducted on December 13, 2001, the average emission rate from the test indicated that uncontrolled PM emissions from the double drum magnetic separator of 3.22 pounds per hour (lb/hr) would fall below the process weight rate limit of 5.38 lb/hr. Newco does not agree that the highest emission factor determined from one run of the stack test be used to compare to the process weight rate limitation for the double drum magnetic separator. The average emission factor of the December 13, 2001 stack test runs was calculated and the stack test results were submitted to IDEM. The average emission factors were determined by IDEM to be in compliance with all applicable permit conditions pertaining to the double drum magnetic separator. Compliance with 326 IAC 6-3-2 is determined by stack testing for three one-hour runs and taking the average emission rate as the result of the stack test. The average emission rate is compared to regulatory limits to determine compliance with the rule. Therefore, Newco requests all permitting requirements for operating the double drum magnetic separator baghouse (MS-BH) be removed from the permit.

Response 8:

Although using the average emission factor from the stack test indicates that the baghouse is not required for compliance, using the worst case emission factor from the stack test supports that the baghouse is required to show compliance with 326 IAC 6-3-2, Particulate emission limitations, work practices, and control technologies. Based on these results, IDEM, OAQ, cannot determine that a future stack test would not indicate that the baghouse is needed, and, thus, the facility is not in compliance with the applicable rules. Therefore, IDEM, OAQ, uses the worst case emission factor

from a stack test to determine emission factors, and there are no changes to the permit as a result of this comment.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

Construction conditions in Section D.2 existed because two (2) of the three (3) rotary furnaces had not been constructed at the time the Part 70 Operating Permit was issued. Since those two (2) furnaces will not be constructed, the construction conditions (Conditions D.2.1 through D.2.5) have been removed from Section D.2, and the remainder of Section D.2 has been renumbered accordingly. Conditions D.2.8 (formerly D.2.12), D.2.10 (formerly D.2.14) and D.2.15 (formerly D.2.19) have been revised to reference the correct conditions.

Change 2:

According to the limitations in the permit, this source is a major source pursuant to 326 IAC 2-2, PSD. The rotary furnace was previously permitted to operate at 6.0 million British thermal units per hour and 3,000 pounds of aluminum per hour. Although there are no physical changes to the unit, the increase in the permitted capacity is considered a modification pursuant to 326 IAC 1-2-42, "Modification" definition, because operating at a higher capacity is considered a change in the method of operation and the potential to emit will increase from the permitted emission levels.

The PM emissions are limited by 40 CFR Part 63.1505, Subpart RRR, in the permit to 0.40 pounds per ton, which is equivalent to 6.13 tons per year. That rule, however, is not in effect until the date of approval of the Operation, Maintenance and Monitoring Plan by IDEM, OAQ, and the rule is not in effect for this source until March 23, 2004. Thus, until that date, another limit in the permit must ensure that this modification is a minor modification to an existing major source pursuant to 326 IAC 2-2, PSD. In order to make this modification a minor modification to an existing major source, PM and PM_{10} limits have been added to the permit. In order to show that the modification is minor the entire facility must be limited because it is not technically feasible to show compliance with a limitation on the increase in emissions.

The potential to emit PM from the rotary furnace is limited to less than 5.71 pounds per hour, equivalent to less than twenty-five (25) tons per year. The potential to emit PM_{10} from the rotary furnace is limited to less than 3.42 pounds per hour, equivalent to less than 15 tons per year. Since the potential to emit PM and PM_{10} after control by the baghouse is 0.857 pounds per hour, the one (1) rotary furnace will comply with this limit. Stack tests for PM_{10} are added to the permit because the PM_{10} limit is required to make 326 IAC 2-2, PSD, not applicable, and the control device must operate properly to ensure compliance with the limit. Changes to the permit are as follows:

D.2.1 Particulate Matter (PM_{10}) [326 IAC 2-2] [40 CFR 52.21, PSD]

The potential to emit PM_{10} from the rotary furnace shall be limited to less than 3.42 pounds per hour. This will limit the potential to emit PM_{10} from the rotary furnace to less than 15 tons per year. Thus, the requirements of 326 IAC 2-2 and 40 CFR 52.21, PSD, are not applicable.

D.2.~~6~~**2** Particulate Matter (PM) [326 IAC 6-3-2~~(c)~~**(e)**] **[326 IAC 2-2] [40 CFR 52.21, PSD**]

(a) Pursuant to 326 IAC 6-3 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~allowable PM~~ **particulate** emission rate from the rotary

furnace shall not exceed 9.49 pounds per hour, when operating at a process weight rate of 7,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) The potential to emit PM from the rotary furnace shall be limited to less than 5.71 pounds per hour. This will limit the potential to emit PM from the rotary furnace to less than 25 tons per year. Thus, the requirements of 326 IAC 2-2 and 40 CFR 52.21, PSD, are not applicable.

D.2.~~12~~**8** Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR Part 63.1511, Subpart RRR]

(c) During the period between 30 and 36 months after issuance of SPM 093-15313-05064, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM_{10} testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

Change 3:

A revised 326 IAC 6–3 became in effect on June 12, 2002. The requirements of this rule have not changed for the facilities at this source. In order to more closely reflect the wording of the rule and to correct the rule cite and title, Conditions D.1.2, D.2.2 (formerly D.2.6), D.3.1, D.4.1 and D.5.1 have been revised as follows:

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2~~(c)~~**(e)**]

Pursuant to 326 IAC 6-3 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~allowable PM~~ **particulate** emission rate from the dryer and afterburner shall not exceed 19.2 pounds per hour when operating at a process weight rate of 20,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.~~6~~**2** Particulate Matter (PM) [326 IAC 6-3-2~~(c)~~**(e)**] **[326 IAC 2-2] [40 CFR 52.21, PSD**]

(a) Pursuant to 326 IAC 6-3 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~allowable PM~~ **particulate** emission rate from the rotary furnace shall not exceed 9.49 pounds per hour, when operating at a process weight rate of 7,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) The potential to emit PM from the rotary furnace shall be limited to less than 5.71 pounds per hour. This will limit the potential to emit PM from the rotary furnace to less than 25 tons per year. Thus, the requirements of 326 IAC 2-2 and 40 CFR 52.21, PSD, are not applicable.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2~~(c)~~**(e)**]

Pursuant to 326 IAC 6-3 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~allowable PM~~ **particulate** emission rate from the conveyorized screen separator shall not exceed 10.4 pounds per hour when operating at a process weight rate of 8,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2~~(c)~~**(e)**]

Pursuant to 326 IAC 6-3 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~allowable PM~~ **particulate** emission rate from the double drum magnetic separator shall not exceed 5.38 pounds per hour when operating at a process weight rate of 3,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2~~(c)~~**(e)**]

Pursuant to 326 IAC 6-3 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~allowable PM~~ **particulate** emission rate from the hammermill shall each not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Change 4:

The applicant had requested that the pressure drop of 7 to 11 inches of water, determined during the latest stack test for the rotary furnace be included in the permit. However, according to the latest stack test for the rotary furnace, conducted on May 21 and 22, 1998, the pressure drop should be in the range of 5 and 9.5 inches of water, not 7 and 11 inches of water. Based on the latest stack test and manufacturer's specifications for the baghouse, Condition D.2.11 (formerly D.2.7) is corrected as follows:

D.2.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the rotary furnace, at least once per working shift when the rotary furnace is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse RF-BH shall be maintained within the range of ~~7.0~~ **5.0** and ~~11.0~~ **12.0** inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instruments used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Clarification 1:

No emission information was provided in the TSD to the Part 70 Operating Permit for HAPs. The following table identifies the HAPs emitted at this source:

HAPs	**Potential To Emit** (tons/year)
HCl	greater than 10
Dioxin	less than 10
Antimony	less than 10
Arsenic	less than 10
Beryllium	less than 10
Cadmium	less than 10
Chromium	less than 10
Cobalt	less than 10
Lead	less than 10
Manganese	less than 10
Nickel	less than 10
Selenium	less than 10
Mercury	less than 10
Phosphorus	less than 10

HAPs	**Potential To Emit** (tons/year)
Benzene	less than 10
Dichlorobenzene	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Toluene	less than 10
TOTAL	greater than 25

The HCl emissions are limited by 40 CFR Part 63.1505, Subpart RRR, in the permit to 0.40 pounds per ton, which is equivalent to 6.13 tons per year from the rotary furnace and 1.50 pounds per ton, which is equivalent to 65.7 tons per year from the drum dryer. Thus, the potential to emit any individual HAP is greater than 10 tons per year and the potential to emit any combination of HAPs is greater than 25 tons per year. This is a clarification and does not describe any changes to the permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	**Newco Metals Processing, Inc.**
Source Location:	**4635 Peerless Road, Bedford, Indiana 47421**
County:	**Lawrence**
SIC Code:	**3341**
Operation Permit No.:	**T 093-7641-05064**
Operation Permit Issuance Date:	**September 1, 1999**
Significant Permit Modification No.:	**093-15313-05064**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a modification application from Newco Metals Processing, Inc., formerly Mica Metals Incorporated, relating to the following changes to the Title V Operating Permit:

(a) The applicant has indicated that the capacities of the one (1) natural gas-fired rotary furnace, identified as MF3, and the one (1) double drum magnetic separator, identified as SP, were incorrect when provided in the Part 70 permit application. These capacities are corrected in this modification and the applicable rules and permit terms have been re-evaluated based on these changes. In addition, the identity of these facilities, and the conveyorized screen separator, their control devices and stacks have been changed to better describe the processes. There were no changes to the emission units. Corrections to the capacities and facility identifications are as follows (removed language is crossed out and added language is in bold type):

(1) One (1) custom natural gas-fired rotating drum dryer **(scrap dryer)**, identified as DR, with a **maximum capacity of 20,000 pounds of aluminum per hour and a** maximum heat input capacity of 4.24 million British thermal units per hour, using an 8.5 million British thermal unit per hour afterburner as control, and exhausting to stack DR-1.

(2) One (1) natural gas-fired rotary furnace, identified as **RF** ~~MF3~~, with a maximum heat input capacity of ~~6.0~~ **9.0** million British thermal units per hour, and a maximum capacity of **7,000** ~~3,000~~ pounds of aluminum per hour, using a capture hood and a baghouse ~~(BH-M6)~~ **(RF-BH)** as control, and exhausting to stack ~~BH-M6~~ **RF-BH**.

(3) One (1) double drum magnetic separator, identified as ~~SP~~ **MS**, with a maximum capacity of ~~8,000~~ **3,000** pounds of scrap aluminum per hour, using a capture hood and a baghouse ~~(BH-2)~~ **(MS-BH)** as control, and exhausting to stack **MS-BH** ~~BH-2~~.

(4) One (1) conveyorized screen separator, identified as ~~4922~~ **SS**, with a maximum capacity of 8,000 pounds of scrap aluminum per hour, using a capture hood and a baghouse **(SS-BH)** ~~(BH-3)~~ as control, and exhausting to stack **SS-BH** ~~BH-3~~.

(b) The following permitted facilities have been removed from the source, or were never constructed, and the applicant has requested their removal from the permit:

(1) Two (2) natural gas-fired rotary furnaces, identified as MF1 and MF2, with maximum heat input capacities of 6.0 million British thermal units per hour, each, and maximum capacities of 3,000 pounds of aluminum per hour, each, using capture hoods and a baghouse (BH-4) as control, and exhausting to stack BH-4.

(2) One (1) centrifuge, identified as CT.

This change has been made to the permit.

(c) The applicant has requested the removal of the requirement for a continuous surveillance system on the rotating drum dryer. The continuous surveillance system will no longer be required upon compliance with 40 CFR 63, Subpart RRR, as described in the Compliance Requirements section of this document.

(d) Based on a stack test conducted on the rotary furnace baghouse (RF-BH) in 1998, the pressure drop of the baghouse is in the range of 7 and 11 inches of water. In the permit, the pressure drop across baghouse BH-4 must be maintained within the range of 5.0 and 8.0 inches of water and the pressure drop across baghouse BH-M6 must be maintained within the range of 8.0 and 12.0 inches of water or ranges established during the latest stack test. The applicant has requested that the range determined by the test be included in the permit. The permit has been revised as requested.

(e) The applicant has requested an extension on the time allowed before the stack test for the rotary furnace and rotating drum dryer. Stack tests are required by September 1, 2002 in the existing permit. The applicant has requested stack tests for the rotary furnace and rotating drum dryer be conducted by March of 2003. The applicant has been instructed to submit a letter requesting such extension to the Compliance Data Section of IDEM, OAQ. There are no changes to the permit as a result of this request.

(f) The requirements of 40 CFR 63, Subpart RRR, are applicable to this source. The applicant has requested that the applicable requirements be added to the permit. These changes have been made to the permit. The hammermill, which is an aluminum scrap shredder, will not be considered an insignificant activity because it is subject to the requirements of Part 63, Subpart RRR.

(g) The applicant conducted a stack test of the magnetic separator baghouse on December 13, 2001. The applicant believes that this test shows that the baghouse is not required for the source to comply with any rules. Therefore, the applicant has requested that the requirement to operate the baghouse be removed from the permit. This analysis, however, is not correct. The worst case emission factor from a stack test is used to determine emission factors and compliance with the applicable rules. Taking the average emission factor could result in the source exceeding the limits during some hours. Using the highest emission factor determined from the stack test, the baghouse is needed in order for the source to comply with 326 IAC 6-3-2 as discussed in the State Rule Applicability Section of this document.

History

On December 19, 2001, Newco Metal Processing, Inc. submitted an application to the OAQ requesting the changes to their existing Part 70 Operating Permit. Newco Metal Processing, Inc.,

formerly Mica Metals Incorporated, was issued a Part 70 permit (T 093-7641-05064) on September 1, 1999. A first reopening of the Title V Operating Permit (R 093-13383-05064) was issued on January 8, 2002, and a first Administrative Amendment (093-15433-05064) was issued on January 28, 2002.

Enforcement Issue

The source has the following enforcement action pending:

Newco Metals Processing, Inc. operated the magnetic drum separator without a baghouse from February 2000 to June 2001. An Agreed Order is pending.

There are no other enforcement actions pending.

Stack Summary

There are no new stacks at this source.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 19, 2001. Additional information was received on February 5, February 11, March 7 and March 11, 2002.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations. The emission calculations included are only those needed to show compliance with 326 IAC 6-3-2, Process Operations, using the corrected capacities for the rotary furnace and double drum magnetic separator, and the stack test results for the double drum magnetic separator. The emissions from the entire source are not re-evaluated because this source is already a major source pursuant to 326 IAC 2-2, PSD, and this change in the calculated potential to emit does not affect the applicability of any rules.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1), “Significant modification procedures shall be used for applications requesting Part 70 permit modifications that do not qualify as minor permit modifications or as administrative amendments. Every significant change in existing monitoring, Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant. Nothing in this subdivision shall be construed to preclude the Permittee from making changes consistent with this rule that would render existing Part 70 permit compliance terms and conditions irrelevant.” This modification significantly changes monitoring requirements. In addition, this modification does not qualify as a minor modification because it requires a case-by-case determination of an emission limit or other standard and it is a modification under Title I of the Clean Air Act (Part 63, Subpart RRR). Therefore, a Significant Permit Modification is required. There are no physical changes to the source changes

in operations at the source, or increase in emissions. Therefore, no source modification is required for these proposed revisions.

Federal Rule Applicability

(a) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. This permit modification does not result in any NSPS being applicable.

(b) The secondary aluminum production operations are subject to the National Emission Standards for Hazardous Air Pollutants, for Secondary Aluminum Production, 40 CFR 63.1500 (Subpart RRR). A one (1) year extension on having to comply with this rule was granted for this source on February 5, 2002. Pursuant to 40 CFR 63.1501(a) and the extension, this existing affected source must comply with the requirements of Subpart RRR by March 23, 2004. Attached is a copy of the federal rule, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, Subpart RRR.

The provisions of 40 CFR Part 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart RRR.

According to the information provided by the applicant, this source is a major source of hazardous air pollutants (HAPs) because the potential to emit of hydrogen chloride is greater than 10 tons per year and the potential to emit of total HAPS is greater than 25 tons per year. Pursuant to 40 CFR 63, Subpart RRR, and 326 IAC 20-1-1, the secondary aluminum production operations are subject to the following conditions:

Emission Limitations

(1) Pursuant to 40 CFR 63.1505(e), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee must operate the afterburner, having a design residence time of at least one (1) second, at all times when the dryer, which is considered a scrap dryer, is in operation and must maintain an operating temperature at the afterburner of at least 750 °C (1400°F) at all times.

(2) Pursuant to 40 CFR 63.1505(e)(1), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee must not discharge or cause to be discharged to the atmosphere emissions from the scrap dryer in excess of:

(A) 0.10 kg of THC, as propane, per Mg (0.20 lb of THC, as propane, per ton) of feed/charge;

(B) 0.15 kg of PM per Mg (0.30 lb per ton) of feed/charge;

(C) 5.0 Fg of D/F TEQ per Mg (7.0×10^{-5} gr of D/F TEQ per ton) of feed/charge; and

(D) 0.75 kg of HCl per Mg (1.50 lb per ton) of feed/charge.

(3) Pursuant to 40 CFR 63.1505(i) and (k), on and after the date of approval of the Operation, Maintenance and Monitoring Plan by IDEM, OAQ, the rotary furnace,

which is considered a Group I furnace that does not only process clean charge, but does not have a sidewell or inline fluxer, must comply with the following limits, based on a 3-day, 24-hour rolling average emission rate:

(A) 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed/charge;

(B) 15 Fg of D/F TEQ per Mg (2.1 $x10^{-4}$ gr of D/F TEQ per ton) of feed/charge; and

(C) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge.

(4) Pursuant to 40 CFR 63.1505(b)(1), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee must not discharge or cause to be discharged to the atmosphere emissions from the hammermill, which is an aluminum scrap shredder, in excess of 0.023 grams (g) of PM per dry standard cubic meter (dscm) (0.010 grain (gr) of PM per dry standard cubic foot (dscf)).

Operating Requirements

(1) Pursuant to 40 CFR 63.1506(b), the Permittee shall provide and maintain easily visible labels at the rotary furnace and scrap dryer that identifies the applicable emission limit and means of compliance. The labels shall include:

(A) The type of affected emission unit (i.e., scrap dryer/delaquering kiln/decoating kiln and Group 1 Furnace);

(B) The applicable operational standard and control method, including the type of charge to be used in the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan; and

(C) The afterburner operating temperature and design residence time for the scrap dryer.

(2) Pursuant to 40 CFR 63.1506(c), for the scrap dryer and rotary furnace, which are equipped with add-on air pollution control devices, the Permittee must:

(A) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of “Industrial Ventilation: A Manual of Recommended Practice”;

(B) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(C) Operate each capture/collection system according to the procedures and requirements in the Operation, Maintenance, and Monitoring Plan.

(3) Pursuant to 40 CFR 63.1506(d), the Permittee shall install and operate a device

that measures and records the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system in accordance with the Operation, Maintenance, and Monitoring Plan.

(4) The requirements of 40 CFR 63.1506(e) are not required because the hammermill is not equipped with a control device.

(5) The requirement of 40 CFR 63.1506(m) are not applicable because the rotary furnace is not equipped with a lime-injected fabric filter. The baghouse controlling emissions from the rotary furnace does not use a lime injection system.

(6) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

(7) Pursuant to 40 CFR 63.1506(g), the Permittee shall operate the afterburner at all times the respective Scrap Dryer is in operation, in accordance with the OM&M plan. For the afterburner, the Permittee must:

(A) Maintain the 3-hour block average operating temperature of each afterburner at or above the average temperature established during the performance test.

(B) Operate the afterburner in accordance with the OM&M plan.

(8) The Permittee may have to add a particulate control device to the rotating drum dryer and the hammermill in order to comply with the emission limitations of this rule. If a particulate control device, such as a fabric filter, is required, the Permittee must apply to IDEM, OAQ, for a permit modification to include the operating requirements for the control device.

Monitoring Requirements

Pursuant to 40 CFR 63.1510(a), on or after the date the initial performance test is completed or required to be completed, whichever is earlier, the Permittee shall monitor all emission units and control equipment according to the following requirements:

(1) Pursuant to 40 CFR 63.1510(t), the Permittee shall calculate and record the 3-day, 24- hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit, which is the rotary furnace, on a daily basis. To calculate the 3-day, 24-hour rolling average, the Permittee shall:

(A) Calculate and record the total weight of material charged to the furnace for each 24-hour day of operation using the feed/charge weight data collected as required under Subpart RRR.

(B) Multiply the total feed/charge weight to the furnace for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the emission test) to provide emissions for each emission unit for the 24-hour period, in pounds.

(C) Divide the total emissions for the furnace for the 24-hour period by the total material charged to the furnace.

(D) Compute the 24-hour daily emission rate using the equation:

$$E_{day} = \frac{\sum_{i=1}^{n} \left(T_i x E R_i\right)}{\sum_{i=1}^{n} T_i}$$

Where,

E_{day} = The daily respective PM, HCl, or D/F emission rate for the secondary aluminum processing unit for the 24-hour period;

T_i = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period in tons;

ER_i = The measured emission rate for emission unit i as determined in the performance test (lb/ton or Fg/Mg or feed/charge); and

n = The number of emission units in the secondary aluminum processing unit.

(E) Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

(2) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial or amended plan, the Permittee shall comply with the conditions of the submitted plan. The plan shall include the following information:

(A) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(B) A monitoring schedule for each affected unit.

(C) Procedures for the proper operation and maintenance of each affected unit and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(D) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(i) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer=s instructions; and

(ii) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(E) Procedures for monitoring process and control parameters, including procedures for annual inspections of afterburners.

(F) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (A) above, including:

(i) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(ii) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(G) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(3) Pursuant to 40 CFR 63.1510(c), the Permittee shall inspect the labels for the scrap dryer and rotary furnace at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

(4) Pursuant to 40 CFR 63.1510(d), the Permittee must:

(A) Install, operate, and maintain a capture/collection system for the scrap dryer and furnace, which are each equipped with an add-on air pollution control device; and

(B) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(5) Pursuant to 40 CFR 63.1510(e), the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to the furnace and the dryer over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement device or procedure shall be within one (1) percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the

schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(6) Pursuant to 40 CFR 63.1510(f)(1), the Permittee shall install, calibrate, maintain, and continuously operate a bag leak detection system for the baghouse controlling emissions from the rotary furnace. The following requirements shall apply:

(A) The Permittee must install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(B) Each triboelectric bag leak detection system must be installed, calibrated, operated, and maintained according to the »Fabric Filter Bag Leak Detection Guidance,= (September 1997). Other bag leak detection systems must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer=s written specifications and recommendations.

(C) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(D) The bag leak detection system sensor must provide output of relative or absolute PM loadings.

(E) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.

(F) The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.

(G) For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter.

(H) Where multiple detectors are required, the system=s instrumentation and alarm may be shared among detectors.

(I) The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(J) Following initial adjustment of the system, the Permittee must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

(7) Pursuant to 40 CFR 63.1510(g), the Permittee of a scrap dryer using an afterburner

for control shall:

(A) Install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements of continuous monitoring systems in 40 CFR Part 63 Subpart A.

(B) The temperature monitoring device must:

(i) Be installed at the exit of each afterburner's combustion zone.

(ii) Record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period.

(iii) Have a recorder response range including zero and 1.5 times the average temperature established according to the requirements in 40 CFR 63.1512(m).

(iv) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the IDEM, OAQ,.

(C) Conduct an inspection of each afterburner at least once a year and record the results. At a minimum, an inspection must include:

(i) Inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor;

(ii) Inspection for proper adjustment of combustion air;

(iii) Inspection of internal structures (e.g., baffles) to ensure structural integrity;

(iv) Inspection of dampers, fans, and blowers for proper operation;

(v) Inspection for proper sealing;

(vi) Inspection of motors for proper operation;

(vii) Inspection of combustion chamber refractory lining and clean and replace lining as necessary;

(viii) Inspection of afterburner shell for corrosion and/or hot spots;

(ix) Documentation verifying that, for the burn cycle following the inspection, the afterburner is operating properly and all necessary adjustments have been made;

(x) Verification that the equipment is maintained in good operating condition.

(xi) Following an equipment inspection, all necessary repairs must be completed in accordance with the requirements of the OM&M plan.

(8) Pursuant to 63.1510(j), for the rotary furnace the Permittee shall:

(A) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of flux injected into each affected unit. The monitoring system must record the weight for each fifteen (15) minute period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement shall be within one (1) percent of the weight of the reactive component of the flux being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(B) Calculate and record the flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test.

(C) Record, for each fifteen (15) minute time period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of reactive flux.

(D) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test.

(9) The Permittee may have to add a particulate control device to the rotating drum dryer and the hammermill in order to comply with the emission limitations of this rule. If a particulate control device, such as a fabric filter, is required, the Permittee must apply to IDEM, OAQ, for a permit modification to include the monitoring requirements for the control device.

Performance Tests

(1) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(2) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.

(3) Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating

parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

Notifications

(1) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee must provide notification of the anticipated date for conducting performance tests. The Permittee must notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(2) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the hammermill, scrap dryer and rotary furnace. The notification must be signed by the responsible official who must certify its accuracy. The report shall include:

(A) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(B) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(C) Unit labeling as described in 40 CFR 63.1506(b), including process type or each affected unit classification and operating requirements.

(D) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., alkaline agent injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

(E) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for the capture/collection system required in 40 CFR 63.1506(c).

(F) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems required in 40 CFR 63.1510(f).

(G) Approved Operation, Maintenance, and Monitoring Plan.

(H) Startup, shutdown, and malfunction plan.

Reports

(1) Pursuant to 40 CFR 63.1516(a), the Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the

procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(A) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(B) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(2) Pursuant to 40 CFR 63.1516(b), the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report must be submitted if any of the conditions described in 40 CFR 63.1516(b)(1) occur during a six (6) month reporting period.

(3) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

Records

The Permittee shall maintain files of all information, including reports and notifications, required by 40 CFR 63.10 and 40 CFR 63.1517. The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off-site. The Permittee may retain records on microfilm, computer disks, magnetic tape or microfiche.
In addition to the general records required by 40 CFR 60.10(b), the Permittee shall maintain:

(1) For the rotary furnace, the number of total operating hours for the affected source or emission unit during each 6 month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

(2) For the rotary furnace, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid, or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

(3) For the dryer, records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any three (3)-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken.

(4) For the dryer, records of annual afterburner inspections.

(5) For the dryer and rotary furnace, records of the feed/charge weight rates for each operating cycle or time period used in the performance test.

(6) Records of monthly inspections for proper unit labeling for the dryer and rotary furnace.

(7) Records of annual inspections of capture/collection and closed vent systems.

(8) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan; and

(B) Operation, Maintenance, and Monitoring Plan.

(9) For the furnace, records of total charge weight, or if the Permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

(10) The Permittee may have to add a particulate control device to the rotating drum dryer and the hammermill in order to comply with the emission limitations of this rule. If a particulate control device, such as a fabric filter, is required, the Permittee must apply to IDEM, OAQ, for a permit modification to include the record keeping requirements for the control device.

State Rule Applicability - Individual Facilities

The following rule was applicable when the Title V Operating Permit was issued and is included in that permit. Due to the correction of the capacities of two (2) units, the rule is applicable as follows:

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the rotary furnace (RF) shall not exceed 9.49 pounds per hour, when operating at a process weight rate of 7,000 pounds per hour. The potential to emit PM before control by the baghouse is 43.1 pounds per hour and the potential to emit PM after controls by the baghouse is 0.857 pound per hour (See page 2 of 2 of TSD Appendix A). Therefore, the baghouse (RF-BH) must be in operation at all times the rotary furnace is in operation, in order to comply with this limit. Changes are as follows:

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the ~~three (3)~~ rotary furnace~~s~~ shall not exceed ~~5.38~~ **9.49** pounds per hour, ~~each,~~ when operating at a process weight rate of ~~3,000~~ **7,000** pounds per hour~~, each~~.

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the double drum magnetic separator (SP) shall not exceed 5.38 pounds per hour, when operating at a process weight rate of 3,000 pounds per hour. The potential to emit PM before control by the baghouse is 8.59 pounds per hour and the potential to emit PM after control by the baghouse is 0.080 pound per hour (See page 1 of 2 of TSD Appendix A). Therefore, the baghouse (BH-2) must be in operation at all times the double drum magnetic separator is in operation, in order to comply with this limit. Changes are as follows:

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the double drum magnetic separator shall not exceed ~~10.4~~ **5.38** pounds per hour when operating at a process weight rate of ~~8,000~~ **3,000** pounds per hour.

These pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

There are no other changes in, or regarding, applicable state rules.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The compliance monitoring requirements from T 093-7641-05064, issued on September 1, 1999, will remain in the permit.

(b) Pursuant to Condition D.1.6(e) of T 093-7641-05064, issued on September 1, 1999:

Pursuant to CP 093-5345-05064, issued November 7, 1996, stack emissions from the dryer and afterburner shall be monitored via a closed circuit TV Continuous Surveillance system. The Surveillance system shall be made capable of visually recording stack exhaust at night. The Surveillance system shall be operated a minimum of ninety-five percent (95%) of the total possible hours of any thirty (30) day period, and each videotape shall be preserved for inspection for at least thirty (30) days from the date of taping. Emissions recorded on these tapes shall not be used by or against Newco Metals Processing, Inc. in any enforcement action pertaining to visible emissions (326 IAC 5-1-2, Opacity Limitations).

This requirement was incorporated into CP 093-5345-05064 to satisfy the requirements of an agreed order. The applicant has requested the removal of the requirement for a continuous surveillance system on the rotating drum dryer. The applicant has indicated that they have had no visible emission or fugitive dust violations from the dryer and the system

is burdensome and expensive to operate and maintain. The system requires daily maintenance and camera cleanings on the roof of the building every two (2) months. The system is prone to lightning strikes, which cause system failure an average of two (2) to three (3) times each year. The cost of operating the system is $3,840, excluding the capital recovery cost. The applicant will be required to comply with the NESHAP, 40 CFR 63, Subpart RRR for the dryer, and must achieve compliance prior to March 23, 2004. This NESHAP gives the source an option of using a continuous opacity monitor on the dryer or installing a bag leak detection system for scrap dryers controlled by a baghouse. Currently, the dryer is not equipped with a baghouse. This condition is revised to indicate that the Permittee may discontinue use of the closed circuit TV Continuous Surveillance System upon achieving compliance with Subpart RRR and receiving approval of the OM&M from IDEM, OAQ. If the source installs a baghouse to comply with Subpart RRR, the Permittee must apply for prior IDEM, OAQ, approval, and the permit will be modified to include any required baghouse monitoring before use of the continuous surveillance system is discontinued.

(c) The rotating drum dryer, rotary furnace and hammermill will be required to comply with the monitoring requirements of 40 CFR 63.1510, Subpart RRR, as of March 23, 2004.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

The following changes in the facility descriptions have been made to Sections A.2 and A.3 and the Facility Description boxes in Sections D.1 through D.5.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) custom natural gas-fired rotating drum dryer **(scrap dryer)**, identified as DR, with a **maximum capacity of 20,000 pounds of aluminum per hour and a** maximum heat input capacity of 4.24 million British thermal units per hour, using an 8.5 million British thermal unit per hour afterburner as control, and exhausting to stack DR-1.

(b) ~~Two (2) natural gas-fired rotary furnaces, identified as MF1 and MF2, with maximum heat input capacities of 6.0 million British thermal units per hour, each, and maximum capacities of 3,000 pounds of aluminum per hour, each, using capture hoods and a baghouse (BH-4) as control, and exhausting to stack BH-4.~~

~~(c)~~ One (1) natural gas-fired rotary furnace, identified as **RF** ~~MF3~~, with a maximum heat input capacity of ~~6.0~~ **9.0** million British thermal units per hour, and a maximum capacity of **7,000** ~~3,000~~ pounds of aluminum per hour, using a capture hood and a baghouse ~~(BH-M6)~~ **(RF-BH)** as control, and exhausting to stack ~~BH-M6~~ **RF-BH**.

~~(d)~~ **(c)** One (1) conveyorized screen separator, identified as ~~4922~~ **SS**, with a maximum capacity of 8,000 pounds of scrap aluminum per hour, using a capture hood and a baghouse **(SS-BH)** ~~(BH-3)~~ as control, and exhausting to stack **SS-BH** ~~BH-3~~.

~~(e)~~ **(d)** One (1) double drum magnetic separator, identified as ~~SP~~ **MS**, with a maximum capacity of ~~8,000~~ **3,000** pounds of scrap aluminum per hour, using a capture hood and a baghouse ~~(BH-2)~~ **(MS-BH)** as control, and exhausting to stack ~~BH-2~~ **MS-BH**.

(e) One (1) hammermill, identified as HM.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

~~This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):~~

~~(a) One (1) hammermill, identified as HM.~~

~~(b) One (1) centrifuge, identified as CT.~~

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

Changes to Section D.1 of the permit have been made to incorporate the requirements of 40 CFR 63, Subpart RRR, for the dryer and to address the removal of the continuous surveillance system. Changes are as follows:

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the dryer and afterburner shall not exceed 19.2 pounds per hour when operating at a process weight rate of 20,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.3 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the one (1) rotating drum dryer (scrap dryer), identified as DR, as of March 23, 2004, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.1.4 Emission Standards for Secondary Aluminum Production [40 CFR Part 63.1505, Subpart RRR]

(a) Pursuant to 40 CFR 63.1505(e), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee, shall operate the afterburner, having a design residence time of at least one (1) second, at all times when the dryer, which is considered a scrap dryer, is in operation and shall maintain an operating temperature at the afterburner of at least 750 °C (1400 ° F) at all times.

(b) Pursuant to 40 CFR 63.1505(e)(1), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall not discharge or cause to be discharged to the atmosphere emissions from the scrap dryer in excess of:

(1) 0.10 kg of THC, as propane, per Mg (0.20 lb of THC, as propane, per ton) of

feed/charge;

(2) 0.15 kg of PM per Mg (0.30 lb per ton) of feed/charge;

(3) 5.0 μg of D/F TEQ per Mg (7.0 x10^{-5} gr of D/F TEQ per ton) of feed/charge; and

(4) 0.75 kg of HCl per Mg (1.50 lb per ton) of feed/charge.

D.1.5 Operating Requirements for Secondary Aluminum Production [40 CFR Part 63.1506, Subpart RRR]

Pursuant to 40 CFR Part 63.1506, the following conditions shall apply to the scrap dryer, identified as DR, as of March 23, 2004:

(a) Pursuant to 40 CFR 63.1506(b), the Permittee shall provide and maintain easily visible labels that identifies the applicable emission limit and means of compliance. The labels shall include:

(1) The type of affected emission unit (i.e., scrap dryer/delaquering kiln/decorating kiln);

(2) The applicable operational standard and control method, including the type of charge to be used in the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan; and

(3) The afterburner operating temperature and design residence time.

(b) Pursuant to 40 CFR 63.1506(c), the Permittee shall:

(1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice";

(2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(3) Operate each capture/collection system according to the procedures and requirements in the Operation, Maintenance, and Monitoring Plan.

(c) Pursuant to 40 CFR 63.1506(d), the Permittee shall install and operate a device that measures and records the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system in accordance with the Operation, Maintenance, and Monitoring Plan.

(d) Pursuant to 40 CFR 63.1506(g), the Permittee shall operate the afterburner at all times the respective Scrap Dryer is in operation, in accordance with the OM&M plan. For the afterburner, the Permittee shall:

(1) Maintain the 3-hour block average operating temperature of each afterburner

at or above the average temperature established during the performance test.

(2) Operate the afterburner in accordance with the OM&M plan.

(e) If an additional control device, such as a fabric filter, is necessary for the scrap dryer to comply with the emission limitations of Condition D.1.4, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the operating requirements for the control device.

(f) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

D.1.~~4~~ **7** Testing Requirements [326 IAC 2-7-6(1),(6)] **[40 CFR Part 63.1511, Subpart RRR]**

(a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(b) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Method 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(c) In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(d) Within 180 days of March 23, 2004, which is the final compliance date for Subpart RRR, in order to demonstrate compliance with Condition D.1.4, the Permittee shall perform PM, HCl, D/F and THC testing on the outlet of the afterburner on the scrap dryer, identified as DR, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. This test for PM emissions shall also satisfy the requirements of Condition D.1.7(b).

(1) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(2) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The

Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.

(3) Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

D.1.6~~9~~ Visible Emissions Notations

(a) ~~Daily~~ Visible emission notations of the dryer and afterburner stack (DR-1) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) Pursuant to CP 093-5345-05064, issued November 7, 1996, stack emissions from the dryer and afterburner shall be monitored via a closed circuit TV Continuous Surveillance system. The Surveillance system shall be made capable of visually recording stack exhaust at night. The Surveillance system shall be operated a minimum of ninety-five percent (95%) of the total possible hours of any thirty (30) day period, and each videotape shall be preserved for inspection for at least thirty (30) days from the date of taping. Emissions recorded on these tapes shall not be used by or against Newco Metals Processing, Inc. in any enforcement action pertaining to visible emissions (326 IAC 5-1-2, Opacity Limitations). **The Permittee may discontinue use of the closed circuit TV Continuous Surveillance System upon achieving compliance with Subpart RRR and receiving approval of the OM&M from IDEM, OAQ. If the Permittee installs a baghouse to comply with Subpart RRR, the Permittee shall apply for prior IDEM, OAQ, approval, and the permit will be modified to include any required baghouse monitoring before use of the continuous surveillance system is discontinued.**

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.10 Monitoring Requirements for Secondary Aluminum Production [40 CFR Part 63.1510, Subpart RRR]

Pursuant to 40 CFR 63.1510(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall monitor the scrap dryer and the afterburner according to the following requirements:

(a) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial or amended plan, the Permittee shall comply with the conditions of the submitted plan. The plan shall include the following information:

(1) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(2) A monitoring schedule for each affected unit.

(3) Procedures for the proper operation and maintenance of each affected unit and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control parameters, including procedures for annual inspections of afterburners.

(6) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (1) above, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(7) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(b) Pursuant to 40 CFR 63.1510(c), the Permittee shall inspect the labels for the scrap dryer at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

(c) Pursuant to 40 CFR 63.1510(d), the Permittee shall:

(1) Install, operate, and maintain a capture/collection system for the scrap dryer; and

(2) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(d) Pursuant to 40 CFR 63.1510(e), the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to the dryer over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement device or procedure shall be within one (1) percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(e) Pursuant to 40 CFR 63.1510(g), the Permittee shall:

(1) Install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements of continuous monitoring systems in 40 CFR Part 63 Subpart A.

(2) The temperature monitoring device shall:

(A) Be installed at the exit of each afterburner's combustion zone.

(B) Record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period.

(C) Have a recorder response range including zero and 1.5 times the average temperature established according to the requirements in 40 CFR 63.1512(m).

(D) The reference method shall be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the IDEM, OAQ,.

(3) Conduct an inspection of each afterburner at least once a year and record the results. At a minimum, an inspection shall include:

(A) Inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor;

(B) Inspection for proper adjustment of combustion air;

(C) Inspection of internal structures (e.g., baffles) to ensure structural integrity;

(D) Inspection of dampers, fans, and blowers for proper operation;

(E) Inspection for proper sealing;

(F) Inspection of motors for proper operation;

(G) Inspection of combustion chamber refractory lining and clean and replace lining as necessary;

(H) Inspection of afterburner shell for corrosion and/or hot spots;

(I) Documentation verifying that, for the burn cycle following the inspection, the afterburner is operating properly and all necessary adjustments have been made;

(J) Verification that the equipment is maintained in good operating condition.

(K) Following an equipment inspection, all necessary repairs shall be completed in accordance with the requirements of the OM&M plan.

(f) If an additional control device, such as a fabric filter, is necessary for the scrap dryer to comply with the emission limitations of Condition D.1.4, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the monitoring requirements for the control device.

D.1.~~7~~**11** Record Keeping Requirements

(a) To document compliance with Condition ~~D.1.6~~ **D.1.9**, the Permittee shall maintain records of ~~daily~~ visible emission notations of the dryer and afterburner stack (DR-1) exhaust **once per shift**.

(b) To document compliance with Condition ~~D.1.5~~ **D.1.10**, the Permittee shall maintain the following:

(1) Continuous records of the temperature inside the afterburner chamber during normal operation when venting to the atmosphere.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.
(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

(d) As of March 23, 2004, as required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Subpart RRR.

(1) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the facility. The remaining three (3) years of records may be retained off site.

(2) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

(3) The Permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(e) As of March 23, 2004, in addition to the general records required by 40 CFR 63.10(b), the Permittee shall maintain records of:

(1) Records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any three (3)- hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken.

(2) Records of annual afterburner inspections.

(3) Records of the feed/charge weight rates for each operating cycle or time period used in the performance test.

(4) Records of monthly inspections for proper unit labeling for the scrap dryer.

(5) Records of annual inspections of capture/collection and closed vent systems.

(6) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan; and

(B) Operation, Maintenance, and Monitoring Plan.

(f) If an additional control device, such as a fabric filter, is necessary for the scrap dryer to comply with the emission limitations of Condition D.1.4, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the record keeping requirements for the control device.

D.1.12 Notifications and Reports for Secondary Aluminum Production [40 CFR Part 63.1515 and 63.1516, Subpart RRR]

(a) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee shall provide notification of the anticipated date for conducting performance tests.

The Permittee shall notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(b) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the dryer. The notification shall be signed by the responsible official who must certify its accuracy. The report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) Unit labeling as described in 40 CFR 63.1506(b), including process type or each affected unit classification and operating requirements.

(4) The compliant operating parameter value or range established for the dryer with supporting documentation and a description of the procedure used to establish the value (e.g., afterburner operating temperature), including the operating cycle or time period used in the performance test.

(5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for the capture/collection system required in 40 CFR 63.1506(c).

(6) Approved Operation, Maintenance, and Monitoring Plan.

(7) Startup, shutdown, and malfunction plan.

(c) Pursuant to 40 CFR 63.1516(a), prior to March 23, 2004, the Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(d) Pursuant to 40 CFR 63.1516(b), beginning in 2004, the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess

emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(2) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(3) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Part 63, Subpart RRR.

(f) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(g) As of March 23, 2004, for the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the owner or operator shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by Subpart RRR; and

(2) All monitoring, record keeping, and reporting requirements were met during the year.

Changes to Section D.2 of the permit have been made to correct the capacity of the rotary furnace, change the unit identification, remove two (2) rotary furnaces and incorporate the requirements of 40 CFR 63, Subpart RRR. Changes are as follows:

D.2.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the ~~three (3)~~ rotary furnace~~s~~ shall not exceed ~~5.38~~ **9.49** pounds per hour, ~~each,~~ when operating at a process weight rate of ~~3,000~~ **7,000** pounds per hour~~, each~~.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.7 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the one (1) rotary furnace, identified as RF, as of March

23, 2004, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.2.8 Emission Standards for Secondary Aluminum Production [40 CFR Part 63.1505, Subpart RRR]

Pursuant to 40 CFR 63.1505(i) and (k), on and after the date of approval of the Operation, Maintenance and Monitoring Plan by IDEM, OAQ, the rotary furnace, which is considered a Group I furnace that does not only process clean charge, but does not have a sidewell or inline fluxer, shall comply with the following limits, based on a 3-day, 24-hour rolling average emission rate:

(a) 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed/charge;

(b) 15 Fg of D/F TEQ per Mg (2.1 x10^{-4} gr of D/F TEQ per ton) of feed/charge; and

(c) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge.

D.2.9 Operating Requirements for Secondary Aluminum Production [40 CFR Part 63.1506, Subpart RRR]

Pursuant to 40 CFR Part 63.1506, the following conditions shall apply to the one (1) rotary furnace, identified as RF, as of March 23, 2004:

(a) Pursuant to 40 CFR 63.1506(b), the Permittee shall provide and maintain easily visible labels at the rotary furnace that identifies the applicable emission limit and means of compliance. The labels shall include:

(1) The type of affected emission unit (i.e., Group 1 Furnace); and

(2) The applicable operational standard and control method, including the type of charge to be used in the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan.

(b) Pursuant to 40 CFR 63.1506(c), the Permittee shall:

(1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice";

(2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(3) Operate each capture/collection system according to the procedures and requirements in the Operation, Maintenance, and Monitoring Plan.

(c) Pursuant to 40 CFR 63.1506(d), the Permittee shall install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system or other weight determination procedure in accordance with the Operation, Maintenance, and Monitoring Plan.

(d) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value

or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

D.2.9**12** Testing Requirements [326 IAC 2-7-6(1),(6)]**[40 CFR Part 63.1511, Subpart RRR]**

(a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) **Within 180 days after March 23, 2004, which is the final compliance date for Subpart RRR, in order to demonstrate compliance with Condition D.2.8, the Permittee shall perform PM, HCl and D/F testing on the baghouse, identified as RF-BH, using methods as approved by the Commissioner. When testing baghouse, the rotary furnace shall be operated at ninety-five percent (95%) or more of its maximum design capacities. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. This test for PM emissions shall also satisfy the requirements of Condition D.1.12(a).**

(1) **Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).**

(2) **Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee shall use Method 23 in Appendix A to 40 CFR 60 or an alternative method approved by IDEM, OAQ, to measure the concentration of D/F.**

(3) **Pursuant to 40 CFR 63.1511(g), the Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.**

D.2.1~~1~~**4** Visible Emissions Notations

(a) ~~Daily~~ Visible emission notations of the baghouse stack~~s~~ (**RF-BH** ~~BH-4 and BH-M6~~) exhaust shall be performed **once per shift** during normal daylight operations when exhausting to

the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) Pursuant to CP 093-5345-05064, issued November 7, 1996, and Condition ~~D.2.8~~ **D.2.11**, notations of visible emissions escaping the capture hood shall be performed.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.1~~2~~**5** Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse~~s~~ used in conjunction with the ~~three (3)~~ rotary furnace~~s~~, at least once per working shift when ~~any of~~ the ~~three (3)~~ rotary furnace~~s exhausting to that baghouse are~~ **is** in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse **RF-BH** ~~BH-4~~ shall be maintained within the range of ~~5.0~~ **7.0** and ~~8.0~~ **11.0** inches of water ~~and the pressure drop across baghouse BH-M6 shall be maintained within the range of 8.0 and 12.0 inches of water~~ or **a** range~~s~~ established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instruments used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.1~~4~~**7** Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the ~~three (3)~~ rotary furnace~~s~~ when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.18 Monitoring Requirements for Secondary Aluminum Production [40 CFR Part 63.1510, Subpart RRR]

Pursuant to 40 CFR 63.1510(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall monitor the rotary furnace and the baghouse according to the following requirements:

(a) Pursuant to 40 CFR 63.1510(t), the Permittee shall calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for the rotary furnace, on a daily basis. To calculate the 3-day, 24-hour rolling average, the Permittee shall:

(1) Calculate and record the total weight of material charged to the furnace for

each 24-hour day of operation using the feed/charge weight data collected as required under Subpart RRR.

(2) Multiply the total feed/charge weight to the furnace for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the emission test) to provide emissions for each emission unit for the 24-hour period, in pounds.

(3) Divide the total emissions for the furnace for the 24-hour period by the total material charged to the furnace.

(4) Compute the 24-hour daily emission rate using the equation:

$$E_{day} = \frac{\sum_{i=1}^{n} \left(T_{ix} ER_i \right)}{\sum_{i=1}^{n} T_i}$$

Where,

E_{day} = The daily respective PM, HCl, or D/F emission rate for the secondary aluminum processing unit for the 24-hour period;

T_i = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period in tons;

ER_i = The measured emission rate for emission unit i as determined in the performance test (lb/ton or Fg/Mg or feed/charge); and

n = The number of emission units in the secondary aluminum processing unit.

(5) Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

(b) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial or amended plan, the Permittee shall comply with the conditions of the submitted plan. The plan shall include the following information:

(1) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(2) A monitoring schedule for each affected unit.

(3) Procedures for the proper operation and maintenance of each affected unit

and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control parameters.

(6) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (1) above, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(7) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(c) Pursuant to 40 CFR 63.1510(c), the Permittee shall inspect the labels for the rotary furnace at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

(d) Pursuant to 40 CFR 63.1510(d), the Permittee shall:

(1) Install, operate, and maintain a capture/collection system for the furnace; and

(2) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(e) Pursuant to 40 CFR 63.1510(e), the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to the furnace over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement device or procedure shall be within one (1) percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6)

months.

(f) Pursuant to 40 CFR 63.1510(f)(1), the Permittee shall install, calibrate, maintain, and continuously operate a bag leak detection system for the baghouse controlling emissions from the rotary furnace. The following requirements shall apply:

(1) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(2) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997). Other bag leak detection systems shall be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations.

(3) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(4) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

(5) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.

(6) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

(7) For positive pressure fabric filter systems, a bag leak detection system shall be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.

(8) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(9) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(10) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

(g) Pursuant to 63.1510(j), the Permittee shall:

(1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of flux injected into each affected unit. The monitoring system shall record the weight for each fifteen (15) minute period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement shall be within one (1) percent of the weight of the reactive component of the flux being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(2) Calculate and record the flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test.

(3) Record, for each fifteen (15) minute time period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of reactive flux.

(4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test.

D.2.15~~9~~Record Keeping Requirements

(a) To document compliance with Condition ~~D.2.11~~ **D.2.14**, the Permittee shall maintain records of ~~daily~~ visible emission notations of the baghouse stack~~s~~ (**RF-BH** ~~BH-4 and BH-M6~~) exhaust **once per shift**.

(b) To document compliance with Condition ~~D.2.12~~ **D.2.15**, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Records of inlet temperature sensor alarms.

(3) Documentation of all response steps implemented, per event.

(4) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(5) Quality Assurance/Quality Control (QA/QC) procedures.

(6) Operator standard operating procedures (SOP).

(7) Manufacturer's specifications or its equivalent.

(8) Equipment "troubleshooting" contingency plan.

(9) Documentation of the dates vents are redirected.

(c) To document compliance with Condition ~~D.2.14~~ **D.2.17**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.14~~ **D.2.17** and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(e) As of March 23, 2004, as required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Part 63, Subpart RRR.

(1) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the facility. The remaining three (3) years of records may be retained off site.

(2) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

(3) The Permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(f) As of March 23, 2004, in addition to the general records required by 40 CFR 63.10(b), the Permittee shall maintain records of:

(1) The number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

(2) Records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

(3) Records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

(4) Records of monthly inspections for proper unit labeling.

(5) Records of annual inspections of emission capture/collection and closed vent systems.

(6) Records for any approved alternative monitoring or test procedure.

(7) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan; and

(B) OM&M plan.

(8) Records of total charge weight for each twenty-four- (24-) hour period and calculations of three- (3-) day, twenty-four- (24-) hour rolling average emissions.

D.2.20 Notifications and Reports for Secondary Aluminum Production [40 CFR Part 63.1515 and 63.1516, Subpart RRR]

(a) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(b) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the rotary furnace. The notification shall be signed by the responsible official who must certify its accuracy. The report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) Unit labeling as described in 40 CFR 63.1506(b), including process type or each affected unit classification and operating requirements.

(4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., alkaline agent injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

(5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for the capture/collection system required in 40 CFR 63.1506(c).

(6) Analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems required in 40 CFR 63.1510(f).

(7) Approved Operation, Maintenance, and Monitoring Plan.

(8) Startup, shutdown, and malfunction plan.

(c) Pursuant to 40 CFR 63.1516(a), prior to March 23, 2004, the Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air

pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(d) Pursuant to 40 CFR 63.1516(b), beginning in 2004, the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within one (1) hour.

(2) An excursion of a compliant process or operating parameter value or range (e.g., total reactive chlorine flux injection rate, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(3) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(4) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Subpart RRR.

(5) A deviation from the three- (3-) day, twenty-four (24-) hour rolling average emission limit for the furnace.

(e) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) As of March 23, 2004, for the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the owner or operator shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by Part 63, Subpart RRR; and

(2) All monitoring, recordkeeping, and reporting requirements were met during

the year.

Section D.3 of the permit has been revised to change the unit identification of the conveyorized screen separator. Changes are as follows:

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the conveyorized screen separator shall not exceed 10.4 pounds per hour when operating at a process weight rate of 8,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.4 Particulate Matter (PM)

The capture hood and baghouse (**SS-**BH~~-3~~) for PM control shall be in operation at all times when the conveyorized screen separator is in operation.

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack (**SS-**BH~~-3~~) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the conveyorized screen separator, at least once per working shift when the conveyorized screen separator is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse **SS-**BH~~-3~~ shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAM,

and shall be calibrated at least once every six (6) months.

D.3.9 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack (**SS-**BH~~-3~~) exhaust.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Section D.4 of the permit has been changed to correct the capacity of the double drum magnetic separator and change the unit identification. Changes are as follows:

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the double drum magnetic separator shall not exceed ~~10.4~~ **5.38** pounds per hour when operating at a process weight rate of ~~8,000~~ **3,000** pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.4 Particulate Matter (PM)

The capture hood and baghouse (**MS-**BH-~~2~~) for PM control shall be in operation at all times when the double drum magnetic separator is in operation.

D.4.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack (**MS-**BH-~~2~~) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the double drum magnetic separator, at least once per working shift when the double drum magnetic separator is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse **MS-**BH-~~2~~ shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Temperature Sensor Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.9 Record Keeping Requirements

(a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack (**MS-**BH-~~2~~) exhaust.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall

be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Section D.5 has been revised to remove the centrifuge and incorporate the requirements of 40 CFR 63, Subpart RRR, for the hammermill. Changes are as follows:

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

~~(a)~~ Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the hammermill shall each not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.

~~(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the centrifuge shall each not exceed 7.58 pounds per hour when operating at a process weight rate of 5,000 pounds per hour.~~

The pounds per hour limitation~~s were~~ **was** calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the hammermill, as of March 23, 2004, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.5.3 Emission Standards for Secondary Aluminum Production [40 CFR Part 63.1505, Subpart RRR]

Pursuant to 40 CFR 63.1505(b)(1), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall not discharge or cause to be discharged to the atmosphere emissions from the hammermill, which is an aluminum scrap shredder, in excess of 0.023 grams (g) of PM per dry standard cubic meter (dscm) (0.010 grain (gr) of PM per dry standard cubic foot (dscf)).

D.5.4 Operating Requirements for Secondary Aluminum Production [40 CFR Part 63.1506, Subpart

RRR]

Pursuant to 40 CFR Part 63.1506, the following conditions shall apply to the one (1) hammermill, as of March 23, 2004:

(a) If a control device, such as a fabric filter, is necessary for the hammermill to comply with the emission limitation of Condition D.5.3, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the operating requirements for the control device.

(b) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring Plan, the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

D.5.2~~5~~ Testing Requirements [326 IAC 2-7-6(1),(6)] **[40 CFR Part 63, Subpart RRR]**

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~ **Within 180 days of March 23, 2004, in order to demonstrate compliance with Condition D.5.2, the Permittee shall perform PM testing on the hammermill, using methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.**

(a) Pursuant to 40 CFR 63.1511(a), prior to conducting the performance test required by 40 CFR 63, Subpart RRR, the Permittee shall prepare and submit a site-specific test plan in compliance with 40 CFR 63.7(c).

(b) Pursuant to 40 CFR 63.1511(b), following approval of the site-specific test plan, the Permittee shall demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected unit and report the results in the notification of compliance report. The Permittee shall conduct performance tests in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR.

D.5.6 Monitoring Requirements for Secondary Aluminum Production [40 CFR Part 63.1510, Subpart RRR]

Pursuant to 40 CFR 63.1510(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the Permittee shall monitor the hammermill according to the following requirements:

(a) Pursuant to 40 CFR 63.1510(b), the Permittee shall prepare a written Operation, Maintenance, and Monitoring (OM&M) Plan and shall submit the plan to the IDEM, OAQ, for review and approval. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ, for review and approval. Pending approval of the initial

or amended plan, the Permittee shall comply with the conditions of the submitted plan. The plan shall include the following information:

(1) The process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each affected unit and control device.

(2) A monitoring schedule for each affected unit.

(3) Procedures for the proper operation and maintenance of each affected unit and control device used to meet the applicable emission limit in 40 CFR 63.1505.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control parameters, including procedures for annual inspections of afterburners, and if applicable, the procedures to be used for determining feed (or throughput) weight if a measurement device is not used.

(6) Corrective actions to be taken when process operating parameters or add-on control device parameters deviate from the value or range established in (a)(1) above, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time and date corrective action was completed.

(7) A maintenance schedule for each affected unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(b) If a control device, such as a fabric filter, is necessary for the hammermill to comply with the emission limitation of Condition D.5.3, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the monitoring requirements for the control device.

D.5.7 Record Keeping Requirements [40 CFR 63.1517]

(a) The Permittee shall maintain files of all information, including reports and

notifications, required by 40 CFR 63.10 and 40 CFR 63.1517. The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off-site. The Permittee may retain records on microfilm, computer disks, magnetic tape or microfiche.

(b) In addition to the general records required by 40 CFR 60.10(b), the Permittee shall maintain a current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(1) Startup, shutdown, and malfunction plan; and

(2) Operation, Maintenance, and Monitoring Plan.

(c) If a control device, such as a fabric filter, is necessary for the hammermill to comply with the emission limitation of Condition D.5.3, the Permittee shall apply to IDEM, OAQ, for a permit modification to include the record keeping requirements for the control device.

D.5.8 Notifications and Reports for Secondary Aluminum Production [40 CFR Part 63.1515 and 63.1516, Subpart RRR]

(a) Pursuant to 40 CFR 63.1515(a)(6), as required by 40 CFR 63.9(e) and (f), the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.

(b) Pursuant to 40 CFR 63.1515(b), the Permittee shall submit a notification of compliance status reports no more than 60 days after March 23, 2004 for the hammermill. The notification shall be signed by the responsible official who must certify its accuracy. The report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each affected unit, including data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., alkaline agent injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

(4) Approved Operation, Maintenance, and Monitoring Plan.

(5) Startup, shutdown, and malfunction plan.

(c) Pursuant to 40 CFR 63.1516(a), the Permittee shall develop and implement a written

plan that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the emission limit. The Permittee shall keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the startup, shutdown, and malfunction plan. The plan shall include the following:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(d) Pursuant to 40 CFR 63.1516(b), beginning in 2004, the Permittee shall submit a semi-annual report within 60 days after the end of each six (6) month period detailing all deviations from the Operation, Maintenance, and Monitoring Plan. When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(2) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(3) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Subpart RRR.

(e) Pursuant to 40 CFR 63.1516(b)(3), the Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) As of March 23, 2004, for the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the owner or operator shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by Part 63, Subpart RRR; and

(2) All monitoring, recordkeeping, and reporting requirements were met during the year.

Conclusion

This proposed modification to the permit shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 093-15313-05064.

Appendix A: Emission Calculations
Double Drum Magnetic Separator

Company Name: Newco Metals Processing, Inc
Address City IN Zip: 4635 Peerless Road, Bedford, Indiana 47421
Part 70 Permit Modification: 093-15313
Plt ID: 093-05064
Reviewer: CarrieAnn Paukowits
Date: December 19, 2001

Results from stack tests conducted on December 13, 2001

Test Run	Througput (tons/hr)	Inlet PM (lbs/hr)	Outlet PM (lbs/hr)	Inlet PM10 (lbs/hr)	Outlet PM10 (lbs/hr)	Capture Efficiency (%)	PM Emission Factor before control (lbs/ton)	PM Emission Factor after controls (lbs/ton)	PM10 Emission Factor before control (lbs/ton)	PM10 Emission Factor after controls (lbs/ton)
1	1.50	5.638	0.066	0.1072	0.1209	97.6%	**5.728**	0.044	0.109	0.081
2	1.48	2.115	0.0793	0.2886	0.0498	97.6%	2.149	**0.054**	**0.293**	0.034
3	1.49	1.907	0.0512	0.1643	0.1297	97.6%	1.938	0.034	0.167	**0.087**

Capacity (tons/hr)	Worst Case PM Emission Factor before control (lbs/ton)	Worst Case PM Emission Factor after control (lbs/ton)	Worst Case PM10 Emission Factor before control (lbs/ton)	Worst Case PM10 Emission Factor after control (lbs/ton)	Potential PM Emissions before control (lbs/hr)	Potential PM Emissions before control (tons/yr)	Potential PM Emissions after control (lbs/hr)	Potential PM Emissions after control (tons/yr)	Potential PM10 Emissions before control (lbs/hr)	Potential PM10 Emissions before control (tons/yr)	Potential PM10 Emissions after control (lbs/hr)	Potential PM10 Emissions after control (tons/yr)
1.5	5.728	0.054	0.293	0.087	8.59	37.6	0.080	0.352	0.440	1.93	0.131	0.572

Methodology

PM (or PM10) Emission Factor before Controls (lbs/ton) = Inlet PM (or PM10) (lbs/hr) / Throughput (lbs/hr)
PM (or PM10) Emission Factor after Controls (lbs/ton) = Outlet PM (or PM10) (lbs/hr) / Throughput (lbs/hr)

Potential PM (or PM10) emissions before controls (lbs/hr) = Capacity (tons/hr) x Worst Case PM (or PM10) emission factor before controls
Potential PM (or PM10) emissions after controls (lbs/hr) = Capacity (tons/hr) x Worst Case PM (or PM10) emission factor after controls
Potential PM (or PM10) emissions (tons/yr) = Potential PM (or PM10 emissions (lbs/hr) x 8,760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Baghouse Operations

Company Name: Newco Metals Processing, Inc
Address City IN Zip: 4635 Peerless Road, Bedford, Indiana 47421
Part 70 Permit Modification: 093-15313
Plt ID: 093-05064
Reviewer: CarrieAnn Paukowits
Date: December 19, 2001

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
RF-BH	98.01%	0.002	50000.0	43.1	189	0.857	3.75

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)